

Strategic Environmental Assessment (SEA) for the Albury Neighbourhood Plan

Environmental Report to accompany Regulation 14 version of the
Neighbourhood Plan

Albury Parish Council

March 2026

Quality information

<u>Prepared by</u>	<u>Checked by</u>	<u>Verified by</u>	<u>Approved by</u>
O.M. Environmental Consultant	R.P. Principal Planner	C.B. Associate Director	N.C.B. Technical Director
R.C. Principal Consultant			

Revision History

<u>Revision</u>	<u>Revision date</u>	<u>Details</u>	<u>Name</u>	<u>Position</u>
V1.0	October 2025	Draft for Neighbourhood Group comment	S.D.	Neighbourhood Group representative
V2.0	January 2026	Updated draft for Group comment	R.P.	Principal Planner
V3.0	March 2026	Regulation 14 consultation version	N.C.B.	Technical Director

Prepared for:

Albury Parish Council

Prepared by:

AECOM Limited
3 Rivergate
Temple Quay, Redcliffe
Bristol, United Kingdom
BS1 6GD

aecom.com

© 2026 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited ('AECOM') in accordance with its contract with Locality (the 'Client') and in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. AECOM shall have no liability to any third party that makes use of or relies upon this document.

Table of Contents

Non-Technical Summary	i
1. Introduction	1
2. Local Plan Context and Vision for the Neighbourhood Plan....	4
3. What is the Scope of the SEA?	6
4. Consideration of Reasonable Alternatives	15
5. Appraising the Regulation 14 Version of the ANP	31
6. What Are the Next Steps?	44

Abbreviations of key terms

AGLV	Area of Great Landscape Value
ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
ANP	Albury Neighbourhood Plan
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
BMV	Best and Most Versatile (land)
BNG	Biodiversity Net Gain
BOA	Biodiversity Opportunity Area
CAA	Conservation Area Appraisal
EV	Electric Vehicle
GHG	Greenhouse Gas
HER	Historic Environment Record
IRZ	Impact Risk Zone
LAA	Land Availability Assessment
LCA	Landscape Character Assessment
LDS	Local Development Scheme
LHNS	Local Housing Needs Survey
LNR	Local Nature Reserve
NCA	National Character Area
NL	National Landscape
NP	Neighbourhood Plan
NPPF	National Planning Policy Framework
PRoW	Public Rights of Way
RIGS	Regionally Important Geological/Geomorphological Site
SEA	Strategic Environmental Assessment
SNCI	Site of Nature Conservation Importance
SOA	Site Options and Assessment
SPA	Special Protection Area
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
TPO	Tree Preservation Order

Non-Technical Summary

What is Strategic Environmental Assessment?

A Strategic Environmental Assessment (SEA) has been undertaken to inform the Albury Neighbourhood Plan (hereafter referred to as “the ANP”). This process is required by the SEA Regulations.

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to help avoid adverse environmental and socio-economic effects through the Neighbourhood Plan and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

What is the Albury Neighbourhood Plan?

The ANP has been prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012.

Purpose of this Environmental Report

This Environmental Report, which accompanies the Regulation 14 version of the ANP, is the latest document to be produced as part of the SEA process. The first document was the SEA Scoping Report (May 2025), which included information about the neighbourhood area’s environment and community.

The purpose of this Environmental Report is to:

- Identify, describe, and evaluate the likely significant effects of the ANP and alternatives.
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the ANP and its relationship with other relevant policies, plans and programmes.
- Relevant aspects of the current and future state of the environment and key sustainability issues for the area.
- The SEA Framework of objectives against which the ANP has been assessed.
- The appraisal of alternative approaches for the ANP.
- The likely significant effects of the ANP.
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the ANP.
- The next steps for the ANP and accompanying SEA process.

Consideration of reasonable alternatives

Introduction

In accordance with the SEA Regulations the Environmental Report must include...

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.

Housing context for the ANP

The National Planning Policy Framework (NPPF) provides an overarching framework for development in England. It sets out the government's planning policies for England and how these are expected to be applied. It is supported by planning practice guidance, which is a suite of policy papers covering a broad range of topics, including SEA. Neighbourhood plans must be in general conformity with the NPPF. The revised NPPF¹ (2025) includes significant reforms aimed at boosting housing supply and supporting sustainable growth. One of the key changes is the reintroduction of mandatory housing targets, which result in an increased housing need figure for Guildford Borough.

As noted in Chapter 2, the Guildford Local Plan identifies Albury as a 'small village' in a rural area and as such, does not allocate sites, and is not given a housing requirement. However, it is recognised that Guildford Borough Council are in the process of updating their Local Plan to consider the latest evidence base and national policy context. On this basis, the housing position for the authority area is likely to be influenced by 1) the increased housing numbers for the borough as outlined by the revised standard method in the latest NPPF, and 2) the absence of a five-year housing land supply in the borough as outlined in the Council's latest position statement (dated 1st April 2025)². The ANP is therefore taking a proactive approach to identifying sites for housing within the Neighbourhood Plan to meet locally identifiable needs.

The housing requirement for the neighbourhood area has been informed by two housing needs surveys, initially undertaken in 2018 and then updated in 2024. The Local Housing Needs Survey (LHNS)³ highlights a housing stock profile which is skewed to larger properties, with the cost of market housing in the parish a significant barrier to young people, families and those on lower incomes. It is anticipated that the ANP will identify sites to deliver up to twelve affordable properties and five open market properties during the plan period, informed by the LHNS findings. The ANP will also support opportunities to enhance the vitality of the community, including via supporting opportunities to improve the rural economy and deliver new community infrastructure / facilities.

Consideration of potential site options

To support the identification of sites for allocation within the ANP, an independent and objective site options and assessment (SOA) process has been undertaken to inform plan making. A total of nine sites were identified and taken forward for

¹ MHCLG (2025): [revised NPPF](#)

² Guildford Borough Council (2025): [5YHLS: Interim Position Statement](#)

³ Albury Parish Council (2024): [Local Housing Needs Survey](#)

assessment, from the Neighbourhood Plan call for sites and Guildford Borough Council Land Availability Assessment (LAA) 2023⁴. Of these, Sites A-F were proposed for residential use, and Sites G-I were identified as opportunity sites for rural enterprise (e.g., supporting local employment offer or potential renewable energy generation).

The SOA conclusions were presented via a ‘traffic light’ rating, indicating whether a site option is suitable, available and achievable for development. A rating of ‘red’ indicates the site is not suitable for a neighbourhood plan allocation, while a rating of ‘green’ indicates the site is suitable for a neighbourhood plan allocation. A rating of ‘amber’ indicates the site is potentially suitable for development subject to the application of appropriate mitigation to address any constraints identified.

The SOA concluded that five of the six sites proposed for residential use were potentially suitable for a residential allocation within the neighbourhood plan (i.e., rated ‘amber’). These were:

- Site A – Malcolm’s Field.
- Site B – Rose Cottage.
- Site C – Birmingham Farm.
- Site D – Land behind Albury Mill.
- Site F – Land behind Village Hall.

Detailed SOA findings are presented in the SOA Report which contributes to the evidence base for the ANP and accompanies the ANP at Regulation 14 consultation (see Appendix B in the ANP)⁵.

Site E – Land Adjacent to Albury House, has been omitted as it was rated ‘red’ in the SOA. The SOA found that *‘The remaining site proposed for housing (Site E – Land adjacent to Albury House) is unsuitable for residential development due to its impact on designated heritage assets. Site E has also been considered for use as a car park for overflow parking associated with the village centre. The site is also considered inappropriate for this use due to its impact on designated heritage at Albury House.’*

The five ‘potentially suitable’ site options for a potential residential allocation in the ANP have formed the basis for establishing the reasonable alternatives considered through the SEA. This is considered below.

Options to consider through the SEA

The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing, given the following considerations:

- Housing growth is known to be a matter of key interest amongst residents and other stakeholders; and
- The delivery of new homes is most likely to have a significant effect compared to the other proposals within the ANP. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

⁴ Guildford Borough Council, 2023: [Land Availability Assessment - Guildford Borough Council](#)

⁵ AECOM (2024): Site Options and Assessment Final Report

To support the choice of a development strategy for the ANP, the SEA process has assessed the five potential suitable sites as reasonable alternatives. This is with a view to identifying the relative sustainability merits of the site options for a potential residential allocation in the emerging ANP. Specifically:

- **Option 1:** Support affordable housing on Site A (Malcolm's Field)
- **Option 2:** Support affordable housing on Site B (Rose Cottage)
- **Option 3:** Support affordable housing on Site C (Birmingham Farm)
- **Option 4:** Support affordable housing on Site D (Land behind Albury Mill)
- **Option 5:** Support affordable housing on Site F (Land behind Village Hall)

The options are shown in **Figure NTS1** below.

Appraising the options

The five options identified have been appraised through the SEA. For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through SEA scoping as a methodological framework. Where appropriate neutral effects, or uncertainty, will also be noted.

An initial discussion of the similarities across the five options has been established under each SEA theme. This is followed by a detailed summary of the key differences between the options, to enable the sustainability trade-offs to be identified.

To support the appraisal findings, the options have been ranked in terms of their sustainability performance against the relevant SEA theme (with '1' being the most well performing option), with conclusions reached on whether the options are likely to have significant effects on the baseline. It is anticipated that this will provide the reader with a likely indication of the relative performance of the options in relation to each theme considered. Likely significant effects are defined as positive, negative, or mixed (i.e., both positive and negative effects are anticipated). Where potential effects are uncertain, this is noted by a '?'.

Every effort is made to predict effects accurately, however, where there is a need to rely on assumptions to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text. Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'.



Figure NTS1: Options appraised as reasonable alternatives through the SEA

Summary of appraisal findings

Detailed assessment findings are presented in **Chapter 4** within the main body of the Environmental Report. A summary of the assessment findings is presented in **Table NTS1**, below. For each of the topics that comprise the SEA Framework) the columns to the right-hand side rank the options in order of performance (with '1' being the most well performing option) and conclude whether the options are likely to have likely significant effects on the baseline.

Table NTS1: Appraisal findings - rankings and likely significant effects

SEA Theme		Option 1 (Site A)	Option 2 (Site B)	Option 3 (Site C)	Option 4 (Site D)	Option 5 (Site F)
Air Quality	Option Rank	4	3	1	=2	=2
	Significant effects?	No	No	No	No	No
Biodiversity and Geodiversity	Option Rank	3	2	1	5	4
	Significant effects?	Yes - mixed	Yes - mixed	No	Yes - negative	Yes - negative
Climate Change (including Flood Risk)	Option Rank	=1	=1	=1	2	3
	Significant effects?	No	No	No	No	Yes - negative
Community Wellbeing	Option Rank	1	2	3	4	4
	Significant effects?	Yes - positive	Yes - mixed	Yes - mixed	?	Yes - mixed
Historic Environment	Option Rank	4	2	3	=1	=1
	Significant effects?	Yes - negative	Yes - negative	Yes - negative	Yes - negative	Yes - negative
Land, Soil, and Water Resources	Option Rank	2	=1	=1	=3	=3
	Significant effects?	Yes - mixed	No	No	Yes - negative	Yes - negative
Landscape	Option Rank	=3	=3	2	=1	=1
	Significant effects?	Yes - negative	Yes - negative	Yes - negative	Yes - negative	Yes - negative
Transportation	Option Rank	1	=3	=3	2	4
	Significant effects?	Yes - mixed	?	?	Yes - mixed	Yes - negative

Establishing the preferred approach

The preferred approach for the ANP has been informed by the SOA findings, SEA findings, and the wider evidence base (including feedback received from community consultation events). The Steering Group have also engaged in discussions with key stakeholders including Guildford Borough Council (GBC), Surrey Community Action, and local landowners. Specifically, the Steering Group's affordable housing site selection report states⁶:

“Advice received from GBC planning was to select only the site/sites needed to deliver the affordable housing need as identified in the Housing Needs Survey 2024 for inclusion in the Neighbourhood Plan. It would not be possible to include sites without defined development proposals due to the sensitivity of Green Belt policy... [and sensitivities associated with the Surrey Hills National Landscape, Albury Conservation Area, and heritage assets].

“The remaining sites could be brought forward as Rural Exception sites under Local Plan policy at a later date if future Housing Needs Surveys identified a need for more affordable homes and the information included in the evidence base would still be valid.”

In light of the above, the Regulation 14 version of the ANP allocates the following two sites as Rural Exception sites for affordable housing, meeting the requirements identified within the LHNS:

- **Site A:** Malcolm's Field (eight homes, including six affordable homes); and
- **Site C:** Birmingham Farm (nine homes, including six affordable homes).

The ANP establishes detailed design guidance and placemaking principles (see Policies ANP1 and ANP3) to help shape any new development areas which might come forward during the plan period. Consideration is also given to the Local Plan policy on the requirements for Rural Exception sites (see Policy H2 and Policy H3). The ANP has a strong focus on design in this respect and has also been informed by various evidence studies including:

- A Design Guides and Codes document prepared for the neighbourhood area (see Appendix A within the ANP).
- The Surrey Hills NL Environmental Design Guidance (Appendix C); and
- A local heritage report (Appendix E) which includes a village character assessment.

Additionally, the ANP encourages opportunities for rural enterprise (e.g., proposals supporting local employment provision or potential renewable energy generation) and opportunities to enhance the tourism offer across the area. The ANP recognises the challenges of delivering growth in light of the significant constraints to development in the neighbourhood area, including the Surrey Hills NL, Metropolitan Green Belt, and heritage assets, but does not seek to preclude high-quality development coming forward during the plan period on available sites (subject to local and national policies and guidance).

⁶ ANP Steering Group (February 2026): 'Affordable Housing Site Selection Report' Appendix Q accompanying the Regulation 14 version of the ANP, containing recommendations for consideration by Albury Parish Council.

Appraising the Regulation 14 draft Plan

For each SEA theme scoped in to the assessment, 'significant' effects of the policy framework within the Regulation 14 version of the ANP on the baseline are predicated and evaluated. Account is taken of the criteria presented within Schedule 2 of the SEA Regulations. For example, account is taken of the probability, duration, frequency, and reversibility of the effects as far as possible. These effect 'characteristics' have been described within the appraisal, as appropriate.

Detailed appraisal findings are presented in **Chapter 5** in the main body of this Environmental Report. A summary of the appraisal findings is presented below.

The likely environmental effects associated with the ANP are identified by the following scoring matrix:

- Significant positive effects (++)
- Minor positive effects (+)
- Neutral or no effects (0)
- Minor negative effects (-)
- Significant negative effects (--)

Broadly neutral effects (0) are anticipated in relation to the Air Quality SEA theme. While new development at supported sites is likely to lead to a net increase in trips to/from Guildford via private car, the level of growth likely to come forward during the plan period is unlikely to lead to significant changes in air quality associated with the AQMAs close by, nor air quality locally in Albury. Consideration is also given to the policy framework supported by the area wide Design Code and Guidance, which seek to reduce and mitigate adverse effects where possible.

Minor positive effects (+) are concluded for the Biodiversity and Geodiversity SEA theme. The policy framework seeks to protect and enhance existing features that contribute to biodiversity in the area whilst also outlining measures which seek to improve the connectivity and functionality of ecological networks and deliver net gains for nature.

The ANP is considered likely to have broadly neutral effects (0) with regard to the Climate Change (including Flood Risk) SEA theme. Whilst growth supported through the ANP is likely to lead to an increase in overall GHG emissions, given the low level of growth which is likely to come forward during the plan period, and considering the global nature of climate change, this is not considered likely to be significant. In addition, the policy framework seeks to improve active travel infrastructure in the neighbourhood area and also seeks to improve climate and flood resilience through design.

The ANP is likely to deliver significant positive effects (++) with respect to the Community Wellbeing SEA theme. This is linked to the strong focus on delivering high-quality, sustainable, and inclusive design within proposals for housing which would meet specific local needs. The wider policy framework introduces opportunities to support the rural economy, improve the offer of local services and facilities, and enhance the quality of the public realm. This includes through safeguarding open spaces and biodiversity, encouraging sustainable tourism, and respecting the area's rich heritage, character and distinctiveness. This will help to

facilitate active and healthy lifestyles for all residents and tourists to the neighbourhood area, supporting quality of life and enjoyment of Albury as a place to visit, live and work.

On balance, broadly neutral effects (0) are concluded for the Historic Environment SEA theme. The policy framework within the ANP has a strong focus on protecting and enhancing the rich heritage resource in the neighbourhood area, notably through the stipulations within the Design Guidance and Codes. Growth during the plan period is therefore likely to safeguard local distinctiveness and apply placemaking principles which respect the special historic interest, character and appearance of heritage assets and areas (and their settings).

Broadly neutral effects (0) are anticipated for the Land, Soil, and Water Resources SEA theme. Development at the supported sites will result in the loss of a small level of greenfield land. However, the sites are not likely to be underlain by best and most versatile land and are set-back from the River Tillingbourne. Additionally, it is recognised that the wider policy framework seeks to protect key features of landscape and biodiversity interest, which will indirectly support land, soil and water resources by safeguarding green infrastructure networks and facilitating improvements to the public realm.

Given the constrained nature of the site allocations in the neighbourhood area (i.e., their location within the Surrey Hills National Landscape and the Metropolitan Green Belt), a precautionary approach is taken, and **minor negative effects (-) are concluded for the Landscape SEA theme.** A degree of uncertainty nonetheless exists, given the strength of the policy provisions (supported by higher level policy) and detailed Design Codes and Guidelines which accompany the ANP.

Broadly neutral effects (0) are concluded for the Transportation SEA theme. Overall, the policy framework supports active travel and encourages a shift toward more sustainable modes of transport where feasible. The ANP also includes measures to address local priorities, for example in relation to parking provision, road safety, and improving connectivity and walkability between key locations.

Next steps

Plan finalisation

This Environmental Report accompanies the ANP for Regulation 14 consultation.

Following Regulation 14 consultation, responses will be considered in finalising the ANP and SEA for submission. Following submission, the ANP and supporting evidence will be published for further consultation and then subjected to Independent Examination. At Independent Examination, the ANP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

If the examination leads to a favourable outcome, the ANP will then be subject to a referendum, organised by Guildford Borough Council. If more than 50% of those who vote agree with the ANP, then it will be 'made'. Once 'made', the ANP will become part of the Development Plan for Guildford, covering the defined neighbourhood area.

Monitoring

The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.

It is anticipated that monitoring of effects of the ANP will be undertaken by Guildford Borough Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the ANP that would warrant more stringent monitoring over and above that already undertaken by Guildford Borough Council.

1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of Albury Parish Council's emerging Neighbourhood Plan. The neighbourhood area covers the Civil Parish of Albury, located in Guildford (Surrey). For ease of reference, all abbreviations used throughout this Environmental Report are listed in the Abbreviations Table above.
- 1.2 The Albury Neighbourhood Plan (the 'ANP') is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012.
- 1.3 It is currently anticipated that the ANP will be submitted to Guildford Borough Council later in 2026.

SEA explained

- 1.4 SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts and maximising the potential for positive effects. Through this approach, the SEA for the ANP seeks to maximise the emerging plan's contribution to sustainable development.
- 1.5 Two key procedural requirements of the SEA Regulations are that:
 - i. When deciding on '*the scope and level of detail of the information*' which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues.
 - ii. A report (the 'Environmental Report') is published for consultation alongside the draft plan (i.e., the draft ANP) that presents outcomes from the environmental assessment (i.e., discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.
- 1.6 This 'Environmental Report' is concerned with item 'ii' above.

SEA screening for the Albury Neighbourhood Plan

- 1.7 A Neighbourhood Plan requires SEA where it is likely to have significant environmental effects. In this respect, Neighbourhood Plans are likely to be screened in as requiring an SEA if both the following apply:
 1. the Neighbourhood Plan is being prepared within an area with significant environmental constraints, such as, for example, Sites of Special Scientific Interest (SSSI) and designated heritage assets; and
 2. the Neighbourhood Plan is likely to allocate sites for development.⁷

⁷ DLUHC (February 2022): Chief Planner's Newsletter, February 2022 'Strategic Environmental Assessment for Neighbourhood Plans: Timely and effective screening' accessible [here](#).

1.8 The ANP has been screened in⁸ by Guildford Council as requiring an SEA. The rationale for this decision has been based on the following considerations:

- The ANP proposes to allocate sites for development.
- The neighbourhood area contains a substantial number of sensitive natural and historic assets; and designations and is wholly within the Surrey Hills National Landscape. In light of the uncertainty over the number, location, and size of potential site allocations, likely significant environmental effects from the policies and proposals in the ANP are anticipated at this stage.
- While the Local Plan has been subject to SA/SEA and it includes a policy covering the type of sites the ANP intends to deliver (rural exception sites), any potential sites considered for an allocation within the ANP have not been subject to SEA.

1.9 In light of this outcome, an SEA process is being undertaken to meet the specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).⁹

Structure of this Environmental Report

1.10 This document is the SEA Environmental Report for the ANP and hence needs to answer all four of the questions listed below with a view to providing the information required by the SEA Regulations. Each of the four questions is answered in turn within this report, as follows:

Table 1.1: Questions that Must be Answered by the SEA Environmental Report to Meet the Regulatory¹⁰ Requirements

Environmental Report question	Sub-question	In line with the SEA Regulations, the report must include... ¹¹
What's the scope of the SEA?	What is the plan seeking to achieve?	An outline of the contents and main objectives of the plan.
What's the scope of the SEA?	What is the sustainability 'context'?	Relationship with other relevant plans and programmes. The relevant environmental protection objectives , established at international or national level. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.

⁸ Guildford Borough Council (2024): [ANP SEA Determination](#)

⁹ UK Government (2004) 'The Environmental Assessment of Plans and Programmes Regulations 2004' can be accessed [here](#).

¹⁰ Environmental Assessment of Plans and Programmes Regulations 2004

¹¹ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

Environmental Report question	Sub-question	In line with the SEA Regulations, the report must include... ¹¹
What's the scope of the SEA?	What is the sustainability 'baseline'?	<p>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.</p> <p>The environmental characteristics of areas likely to be significantly affected.</p> <p>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.</p>
What's the scope of the SEA?	What are the key issues and objectives?	Key problems/issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment.
What has plan-making/SEA involved up to this point?		<p>Outline reasons for selecting the alternatives dealt with.</p> <p>The likely significant effects associated with alternatives.</p> <p>Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.</p>
What are the assessment findings at this stage?		<p>The likely significant effects associated with the Regulation 14 version of the plan.</p> <p>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the Regulation 14 version of the plan.</p>
What happens next?		The next steps for the plan making / SEA process.

2. Local Plan Context and Vision for the Neighbourhood Plan

Local Plan context for the Neighbourhood Plan

- 2.1 In 2019, Guildford Council adopted their Local Plan, which sets out the long-term planning and land use policies within Guildford. The Local Plan includes two documents¹²:
- Strategy and Sites (2019-2034)
 - Development Management Policies (adopted in March 2023)
- 2.2 The Guildford Local Plan identified Albury as a ‘small village’ in a rural area and as such, does not allocate sites, and is not given a housing requirement.
- 2.3 As of February 2024, Guildford Borough Council are in the process of updating the Local Plan. The latest Local Development Scheme (LDS)¹³, published in March 2025, highlights that the update to the Local Plan is in its early stages. Evidence base gathering, early engagement with relevant internal and external stakeholders, and drafting policies is expected to continue until August 2026. Regulation 18 consultation is scheduled to take place between September and October 2026.
- 2.4 The housing position for the authority area is likely to be influenced by 1) the increased housing numbers for the borough as outlined by the revised standard method in the latest NPPF, and 2) the absence of a five-year housing land supply in the borough as outlined in the Council’s latest position statement (dated 1st April 2025). On this basis, the Parish Council are taking a proactive approach to identifying sites for housing within the Neighbourhood Plan to meet locally identifiable needs - which includes twelve affordable homes, with five open market to help fund the latter, as informed by emerging evidence (primarily, a Local Housing Needs Survey).
- 2.5 Neighbourhood plans will form part of the development plan for Guildford, alongside, but not as a replacement for the Local Plan. Neighbourhood plans are required to be in general conformity with the Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in Guildford, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.

Vision, Aims, and Objectives for the ANP

- 2.6 The vision for the ANP captures the community’s views and aspirations for the neighbourhood area as expressed through the neighbourhood planning process. It forms the basis on which the neighbourhood objectives and proposed policies have been formulated.
- 2.7 The vision for the ANP, covering the period between 2026 - 2041, is as follows:

¹² Guildford Borough Council (2019): [Guildford Local Plan: Strategy and Sites \(2015-2034\)](#)

¹³ Guildford Borough Council (2025): [Local Development Scheme](#)

“Albury Parish has grown successfully as a sustainable community whilst protecting the openness and permanence of the Green Belt. The parish has retained its special historic and landscape qualities. New affordable housing, rural economic growth and community facilities meet local needs and have been well designed to address climate change. The character of settlements, landscape, habitats, species, and views throughout the parish have been preserved. The Albury Village Conservation Area and tourist facilities have been enhanced.

“Advances in broadband and sustainable energy have made a positive contribution to the growth of rural businesses and enabled more residents to work locally or from home leading to a more sustainable footprint.

“Traffic management and parking has improved both safety, pollution and quality of life for residents and visitors, without detriment to the area’s special qualities. Whilst change in the wider area has been significant, it has provided opportunities for improved connectivity to services beyond the parish.”

2.8 The vision is accompanied by six objectives:

- To build a long-term and climate resilient sustainable community.
- To sustain and improve local services, businesses, amenities and the visitor experience.
- To protect and enhance the natural environment, green spaces and biodiversity.
- To honour the character of the parish, its settlements, Albury Village Conservation Area and its historic landscape setting.
- To meet identified affordable housing needs.
- To reduce the impact of traffic and improve connectivity to neighbouring villages, towns and services.

3. What is the Scope of the SEA?

Summary of SEA scoping

- 3.1 The SEA Regulations require that: *‘When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies’.*
- 3.2 In England, the consultation bodies are Natural England, the Environment Agency, and Historic England.¹⁴ These authorities were consulted on the scope of the SEA between May 2025 and June 2025.
- 3.3 The purpose of scoping was to outline the ‘scope’ of the SEA through setting out the following information:
- A context review of the key environmental and sustainability objectives of national, regional, and local plans and strategies relevant to the ANP.
 - Baseline data against which the ANP can be assessed.
 - The key sustainability issues for the ANP; and
 - An ‘SEA Framework’ of objectives against which the ANP can be assessed.
- 3.4 The full SEA Scoping Report is available on the Neighbourhood Plan website and accompanies the evidence base for the ANP at Regulation 14 consultation.¹⁵
- 3.5 Responses received on the Scoping Report, and how they were addressed, have been summarised below.

Table 3.1: Consultation responses received on the SEA Scoping Report

Consultation Response	How the Response was Considered and Addressed
Historic England <i>Historic Environment Planning Adviser</i> <i>(response received on 11th June 2025)</i>	
We are content that the scoping report for Albury Neighbourhood Plan adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets.	Comment noted. The likely significant effects of the policies and proposals in the Neighbourhood Plan on the historic environment are considered in Chapter 4 and Chapter 5 of this Environmental Report
Environment Agency	No response received
Natural England	No response received

- 3.6 The key sustainability issues and SEA Framework are presented below.

¹⁴ In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme’.

¹⁵ Including the context review and baseline data for the neighbourhood area, for each SEA theme.

Key sustainability issues

Air Quality

- The neighbourhood area is approximately 3.6km away from the A281, The Street, Shalford, Guildford, Surrey AQMA and 3.7km west of the Guildford Town Centre AQMA, both designated due to high NO₂ emissions. There are also two further AQMAs within 10km of the area. Therefore, the neighbourhood area is fairly constrained in terms of air quality designations.
- The A281 is a key part of the strategic road network surrounding Albury and leads to Guildford, the nearest town to the neighbourhood area (which also has the Guildford Town Centre AQMA). As Guildford is the nearest town to the neighbourhood area, it is likely that many residents travel into this town to access wider services and facilities and employment opportunities. Further, the strategic road network also includes the A248, which runs through the centre of Albury, as well as the A25.
- It is also acknowledged that air quality bears impact on other themes, such as biodiversity, as nitrogen deposition can impact ancient and veteran trees that are very important in the Albury neighbourhood area.
- In light of the above, development in the neighbourhood area, even if only 17 dwellings and 2 rural enterprise sites, could increase travel into neighbouring and larger centres, such as Guildford, particularly via private car. This could worsen air quality, in the two closest AQMAs to the neighbourhood area.

Biodiversity and Geodiversity

- The Thames Basin Heaths Special Protection Area (SPA) is located ~5.6km northwest of the neighbourhood area.
- There are two Sites of Special Scientific Interest (SSSIs) located within the neighbourhood area (Colyers Hanger SSSI, and Blackheath SSSI). There are also four SSSIs within 3km of the neighbourhood area, primarily located to the northeast. These are (in order of distance from Albury), Combe Bottom SSSI (adjacent), Upper Common Pits SSSI (~2km), Hackhurst and White Downs SSSI (~2.6km), and Sheepleas SSSI (~2.9km).
- The Shere Woodlands Local Nature Reserve (LNR) is located adjacent to the neighbourhood area, along the northwest boundary. Also, within 3km is the Pewley Down LNR (~2.1km), Hackhurst Downs LNR (~2.6km), Chinthurst Hill LNR (~2.6km), Sheepleas LNR (~2.9km), Riverside Park LNR (~2.9km), and Sayers Croft LNR (~3km).
- Biodiversity Action Plan (BAP) Priority Habitats within the neighbourhood area include deciduous woodland, good quality semi-improved grassland, traditional orchard, and lowland heathland.
- There are multiple local nature sites, known as Sites of Nature Conservation Importance (SNCIs) in and around the neighbourhood area. These include a nationally important ancient and veteran tree site, with the most important lichens in Surrey, at Albury Park, and an internationally important ancient and veteran yew site at Newlands Corner and Merrow Downs, and lowland heaths, chalk downland and ancient woodland. Ancient woodland (including plantations on ancient woodland sites (PAWS)), and ancient and veteran trees are classed as

irreplaceable habitats. The ancient and veteran tree sites are in areas of woodpasture and parkland Priority Habitat.

- The River Tillingbourne, a globally rare chalk stream that supports unique biodiversity in both flora and fauna, runs through the neighbourhood area.

Climate Change (including Flood Risk)

- There is a potential level of flood risk associated with the River Tillingbourne which runs through the neighbourhood area, and Albury village.
- As the population grows, emissions from the neighbourhood area are likely to rise. Ensuring that new development incorporates best practices, such as energy-efficient design, sustainable construction materials, and renewable energy integration, will be crucial in mitigating this increase.
- The transport sector remains the largest contributor to CO₂ emissions in Guildford. This reinforces the need for improved public transport options, enhanced active travel networks, and local initiatives that promote self-containment and reduce car dependency.
- While domestic energy consumption in the neighbourhood area aligns with the national average, further improvements in energy efficiency, such as retrofitting existing buildings and promoting low-carbon heating solutions, could help reduce overall emissions.
- Guildford Borough Council has declared a climate emergency and is committed to achieving net zero by 2050. Local policies, including those in the ANP, should support this target through carbon reduction initiatives, sustainable design standards, and nature-based solutions for climate adaptation.

Community Wellbeing

- The neighbourhood area has a notably higher proportion of residents aged 50 and above compared to regional and national averages. This demographic trend indicates an ageing population, which may necessitate enhanced healthcare services, accessible housing, and social support systems tailored to older adults. Planning for age-friendly infrastructure and community programs will be important so as to support the wellbeing of this demographic.
- While the majority of homes in the neighbourhood are owner-occupied, there are significant barriers to housing and services, particularly in certain areas. Factors such as high housing costs relative to local incomes, limited availability of affordable housing, and distance from essential services contribute to these challenges. Addressing these issues through strategic planning and policy interventions is crucial to enhance community wellbeing.
- The neighbourhood area does not experience particularly high levels of deprivation broadly, however, it does in the barriers to housing and services domain. Development through the ANP can positively contribute to maintaining this low level of overall deprivation and bringing down deprivation in terms of housing and services by bringing forward affordable new homes to meet the local need and encouraging new community services and facilities to be brought into the neighbourhood area.
- The neighbourhood offers essential community facilities, including a post office, village shop, public houses, churches, a village hall, and various recreational amenities. However, the absence of primary educational institutions and

nurseries within the area means families must rely on facilities in neighbouring communities. Improving local educational infrastructure and transportation links could enhance accessibility and support for families with young children.

Historic Environment

- The neighbourhood area contains several designated heritage assets that significantly contribute to the historic character of the village, particularly within and near the Albury Conservation Area. Therefore, the neighbourhood area is regarded as having a sensitive historic environment that could be affected by development. Consequently, any proposed development close to important heritage assets (both designated and non-designated) must carefully assess the potential impact on the inherent qualities of these assets and their surroundings.
- It is also acknowledged that development under the ANP provides an opportunity to enhance the understanding of, and access to, heritage assets of both local and national significance, which is likely to be a crucial factor in the emerging neighbourhood plan.
- By promoting greater understanding of and access to local and national designations within and around the neighbourhood area, the ANP offers a chance to establish a growth strategy that safeguards the area's historic character and specific heritage features. Additionally, the ANP can contribute to preserving and enhancing the historic environment by ensuring that new developments are designed and laid out with sensitivity to the historic context of the neighbourhood area.

Land, Soil, and Water Resources

- Allocating land for development could trigger changes to land, soil and water resources. It will be important for development to be focused away from BMV land (Grade 1 – 3a)¹⁶. It is noted that there is Grade 4 land south of Albury village (where development is likely to be located) and Grade 3 north.
- The ANP should consider potential effects on waterbody catchments and water quality. Ensuring that future development does not harm water quality, both on-site and off-site, is vital. This might involve introducing measures to prevent water pollution during all stages of development. Additionally, the ANP should look for opportunities to improve water quality, particularly in terms of its chemical makeup.
- The ANP could also consider supporting additional measures to strengthen the resilience of water supplies. This could involve promoting local water recycling projects and finding ways to increase the efficiency of water usage, especially given the expected rise in population and the subsequent increase in water demand.

Landscape

- The neighbourhood area is entirely within the Metropolitan Green Belt and the Surrey Hills National Landscape, both of which place strong controls on development. While the Green Belt focuses on limiting urban sprawl, the National Landscape designation seeks to conserve scenic and ecological value. As a result, there is a need to balance development needs with landscape protection,

¹⁶ Best and Most Versatile (BMV) agricultural land refers to land classified as Grades 1, 2, or 3a under the Agricultural Land Classification system. These grades indicate soils that are the most flexible, productive, and efficient for farming – capable of delivering high crop yields and supporting diverse agricultural uses. Planning policies, including the UK National Planning Policy Framework, advise prioritising development on lower-grade land to preserve BMV land where feasible.

ensuring that any future growth is sensitive to the area’s character and visual qualities.

- The presence of two National Character Areas, the North Downs and the Wealden Greensand, contributes to a varied and distinctive local landscape. These NCAs bring contrasting landforms, ecological features, and historic patterns of land use. Recognising and responding to this variation in any future planning or design work will be important to maintain the area’s sense of place and environmental integrity.
- The wooded hills, chalk grasslands, and extensive footpath network (including the North Downs Way) provide valuable habitats and opportunities for outdoor recreation. These features support biodiversity, promote wellbeing, and enhance the parish’s rural character. However, increased recreational pressure or poorly designed development could threaten these assets, requiring careful management and safeguarding.
- While there are only a small number of Tree Preservation Orders (TPOs), their concentration around Albury village highlights the localised importance of mature trees and green infrastructure. Protecting and enhancing these features, both through statutory and non-statutory means, will support biodiversity, contribute to landscape quality, and help mitigate climate impacts.

Transportation

- Future development in the neighbourhood area has the potential to increase the number of private vehicles on local roads, given the already limited public transportation opportunities and footpaths within the neighbourhood area. This could exacerbate existing traffic and congestion during peak periods and potentially lead to parking issues in the neighbourhood area.
- Sustainable transport in Albury is poor, bus services are relatively infrequent, and the nearest station is located outside of the neighbourhood area. Whilst the Albury Neighbourhood Plan provides an opportunity to encourage improvements to current bus services and encourage improvements to the PRow network, this is unlikely to make a significant difference to the modal split and reliance on the private car.

SEA Framework

3.7 The SEA Framework provides a way in which environmental effects can be defined and subsequently analysed based on standard ‘tests’. Each proposal within the current version (i.e., the Regulation 14 version) of the ANP will be assessed consistently using the Framework.

Table 3.2: The proposed SEA Framework

SEA theme	SEA objective	Supporting assessment questions
Air Quality	Support objectives to improve air quality within and surrounding the neighbourhood area and minimise impacts on nearby AQMAs.	<ul style="list-style-type: none"> • Support the remediation and sustainable redevelopment of brownfield sites to minimise land contamination and emissions? • Incorporate design measures to reduce air pollution, such as green roofs, street trees, or improved ventilation systems?

SEA theme	SEA objective	Supporting assessment questions
		<ul style="list-style-type: none"> • Limit the increase in traffic congestion and vehicle emissions through effective land use planning? • Ensure construction activities minimise air pollution through best practice dust and emissions control? • Implement measures (such as green infrastructure) which will help to support good air quality in the neighbourhood area? • Promote and encourage active and sustainable transport options where appropriate? • Encourage development which reduces the need to travel?
<p>Biodiversity and Geodiversity</p>	<p>Protect and enhance biodiversity and geodiversity.</p>	<ul style="list-style-type: none"> • Protect and enhance designated sites for biodiversity and priority habitats, supporting the integrity of ecological networks? • Achieve biodiversity and environmental net gains and support the delivery of ecosystem services and multifunctional green infrastructure networks? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks? • Support access to, interpretation of, and understanding of biodiversity?
<p>Climate Change (including Flood Risk)</p>	<p>Reduce the contribution to climate change made by activities within the neighbourhood area and increase resilience to the potential effects of climate change.</p>	<ul style="list-style-type: none"> • Reduce the number of journeys made and reduce the need to travel? • Promote the use of more sustainable modes of transport, including walking, cycling, public transport, and electric vehicle (EV) infrastructure? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources, or reduce energy consumption from non-renewable resources? • Improve and extend green infrastructure networks in the neighbourhood area? • Sustainably manage water run-off, and reduce runoff where possible? • Increase the resilience of biodiversity in the area to the effects of climate change,

SEA theme	SEA objective	Supporting assessment questions
Community Wellbeing	Ensure growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.	<p>including through enhancements to ecological networks?</p> <ul style="list-style-type: none"> • Provide everyone with the opportunity to live in good quality, affordable housing? • Support the provision of a range of house types and sizes? • Meet the needs of all sectors of the community? • Provide flexible and adaptable homes that meet people’s needs, particularly the needs of an ageing population? • Improve the availability and accessibility of key local facilities, including health infrastructure? • Encourage and promote social cohesion and active involvement of local people in community activities? • Facilitate green infrastructure enhancements, including improved access to open space? • Maintain or enhance the quality of life of existing residents?
Historic Environment	Protect, conserve, and enhance the historic environment within and surrounding the neighbourhood area.	<ul style="list-style-type: none"> • Protect the integrity of the historic setting of the Albury Conservation Area? • Conserve and enhance buildings and structures of architectural or historic interest, and their settings? • Conserve and enhance designated assets, such as the Historic Park and Garden, and the Scheduled Monuments in the area? • Conserve and enhance the special interest, character and appearance of locally important features and their settings? • Protect the integrity of the historic setting of key monuments of cultural heritage interest as listed in the Surrey County Council Historic Environment Record (HER)? • Support the undertaking of early archaeological investigations and, where appropriate, recommend mitigation strategies? • Support access to, interpretation and understanding of the historic evolution and character of the neighbourhood area?

SEA theme	SEA objective	Supporting assessment questions
Land, Soil, and Water Resources	Ensure the efficient and effective use of land, and protect and enhance water quality, using water resources in a sustainable manner.	<ul style="list-style-type: none"> Promote the use of previously developed land wherever possible? Identify and avoid the development of the BMV land? Support the minimisation, reuse, and recycling of waste? Avoid any negative impacts on water quality and support improvements to water quality? Ensure appropriate drainage and mitigation is delivered alongside proposed development? Protect waterbodies from pollution? Maximise water efficiency and opportunities for water harvesting and/or water recycling? Avoid any negative impacts on mineral and waste infrastructure?
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape.	<ul style="list-style-type: none"> Protect and enhance the local landscape character and visual quality of the area, including features of the Surrey Hills National Landscape? Conserve and strengthen local identity, settlement pattern, and rural character, reflecting the distinct qualities of NCA landscapes? Identify, protect, and where appropriate, enhance locally important views and visual corridors that contribute to the area's sense of place and scenic value? Retain and enhance landscape features that contribute to the setting of the parish, such as mature trees, hedgerows, historic parkland boundaries, and river corridors, especially where they support biodiversity, connectivity, or visual interest? Support the integration of new development that respects the form, scale, and setting of existing settlements, while maintaining openness in accordance with Green Belt policy? Promote access to the countryside through sustainable recreational routes, such as the North Downs Way and local footpath networks, while safeguarding landscape sensitivity and ecological value?
Transportation	Promote sustainable transport use and	<ul style="list-style-type: none"> Support the objectives within the Surrey Local Transport Plan to encourage the use of more sustainable transport modes?

SEA theme	SEA objective	Supporting assessment questions
	active travel opportunities and reduce the need to travel.	<ul style="list-style-type: none">• Encourage a shift to more sustainable forms of travel and enable sustainable transport infrastructure enhancements?• Improve local connectivity and pedestrian and cyclist movement?• Facilitate working from home to reduce the use of private vehicles to access workplaces outside of the neighbourhood area?• Reduce the impact of the transport sector on climate change?• Improve road safety and reduce pollution from vehicles?

4. Consideration of Reasonable Alternatives

Introduction

- 4.1 In accordance with the SEA Regulations the Environmental Report must include:
- An outline of the reasons for selecting the alternatives dealt with; and
 - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.2 The ‘narrative’ of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, how the SEA process to date has informed the consideration of different approaches for key elements of the ANP.

Defining Reasonable Alternatives

- 4.3 Whilst work on the ANP has been underway for some time, the aim here is not to provide a comprehensive explanation of work to date, but rather to explain work undertaken to develop and appraise reasonable alternatives.
- 4.4 In the context of the above, this chapter of the Environmental Report presents information on reasonable alternative approaches to addressing key issues that are of central importance to the ANP. Primarily, the identification of sites for a potential allocation to meet locally identified needs.

Housing Context for the ANP

- 4.5 The National Planning Policy Framework (NPPF) provides an overarching framework for development in England. It sets out the government’s planning policies for England and how these are expected to be applied. It is supported by planning practice guidance, which is a suite of policy papers covering a broad range of topics, including SEA. Neighbourhood plans must be in general conformity with the NPPF. The revised NPPF¹⁷ (2025) includes significant reforms aimed at boosting housing supply and supporting sustainable growth. One of the key changes is the reintroduction of mandatory housing targets, which result in an increased housing need figure for Guildford Borough.
- 4.6 As noted in Chapter 2, the Guildford Local Plan identifies Albury as a ‘small village’ in a rural area and as such, does not allocate sites, and is not given a housing requirement. However, it is recognised that Guildford Borough Council are in the process of updating their Local Plan to consider the latest evidence base and national policy context. On this basis, the housing position for the authority area is likely to be influenced by 1) the increased housing numbers for the borough as outlined by the revised standard method in the latest NPPF, and 2) the absence of a five-year housing land supply in the borough as outlined in the Council’s latest position statement (dated 1st April 2025)¹⁸. The ANP is

¹⁷ MHCLG (2025): [revised NPPF](#)

¹⁸ Guildford Borough Council (2025): [5YHLS: Interim Position Statement](#)

therefore taking a proactive approach to identifying sites for housing within the Neighbourhood Plan to meet locally identifiable needs.

- 4.7 The housing requirement for the neighbourhood area has been informed by two housing needs surveys, initially undertaken in 2018 and then updated in 2024. The Local Housing Needs Survey (LHNS)¹⁹ highlights a housing stock profile which is skewed to larger properties, with the cost of market housing in the parish a significant barrier to young people, families and those on lower incomes. It is anticipated that the ANP will identify sites to deliver up to twelve affordable homes and five open market houses during the plan period, informed by the LHNS findings. The ANP will also support opportunities to enhance the vitality of the community, including via supporting opportunities to improve the rural economy and deliver new community infrastructure / facilities.

Consideration of Potential Site Options

- 4.8 To support the identification of sites for allocation within the ANP, an independent and objective site options and assessment (SOA) process has been undertaken to inform plan making. A total of nine sites were identified and taken forward for assessment, from the Neighbourhood Plan call for sites and Guildford Borough Council Land Availability Assessment (LAA) 2023²⁰. Of these, Sites A-F were proposed for residential use, and Sites G-I were identified as opportunity sites for rural enterprise (e.g., supporting local employment offer or potential renewable energy generation).
- 4.9 The SOA conclusions were presented via a 'traffic light' rating, indicating whether a site option is suitable, available and achievable for development. A rating of 'red' indicates the site is not suitable for a neighbourhood plan allocation, while a rating of 'green' indicates the site is suitable for a neighbourhood plan allocation. A rating of 'amber' indicates the site is potentially suitable for development subject to the application of appropriate mitigation to address any constraints identified.
- 4.10 The SOA concluded that five of the six sites proposed for residential use were potentially suitable for a residential allocation within the neighbourhood plan (i.e., rated 'amber'). These were:
- Site A – Malcolm's Field.
 - Site B – Rose Cottage.
 - Site C – Birmingham Farm.
 - Site D – Land behind Albury Mill.
 - Site F – Land behind Village Hall.
- 4.11 Detailed SOA findings are presented in the SOA Report which contributes to the evidence base for the ANP and accompanies the ANP at Regulation 14 consultation (see Appendix B in the ANP)²¹.
- 4.12 Site E – Land Adjacent to Albury House, has been omitted as it was rated 'red' in the SOA. The SOA found that *'The remaining site proposed for housing (Site E – Land adjacent to Albury House) is unsuitable for residential development*

¹⁹ Albury Parish Council (2024): [Local Housing Needs Survey](#)

²⁰ Guildford Borough Council, 2023: [Land Availability Assessment - Guildford Borough Council](#)

²¹ AECOM (2024): Site Options and Assessment Final Report

due to its impact on designated heritage assets. Site E has also been considered for use as a car park for overflow parking associated with the village centre. The site is also considered inappropriate for this use due to its impact on designated heritage at Albury House.'

4.13 The five 'potentially suitable' site options for a potential residential allocation in the ANP have formed the basis for establishing the reasonable alternatives considered through the SEA. This is considered below.

Options to Consider Through the SEA

4.14 The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing, given the following considerations:

- Housing growth is known to be a matter of key interest amongst residents and other stakeholders; and
- The delivery of new homes is most likely to have a significant effect compared to the other proposals within the ANP. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

4.15 To support the choice of a development strategy for the ANP, the SEA process has assessed the five potential suitable sites as reasonable alternatives. This is with a view to identifying the relative sustainability merits of the site options for a potential residential allocation in the emerging ANP. Specifically:

- **Option 1:** Support affordable housing on Site A (Malcolm's Field)
- **Option 2:** Support affordable housing on Site B (Rose Cottage)
- **Option 3:** Support affordable housing on Site C (Birmingham Farm)
- **Option 4:** Support affordable housing on Site D (Land behind Albury Mill)
- **Option 5:** Support affordable housing on Site F (Land behind Village Hall)

4.16 The options are shown in Figure 4.1 overleaf.



Figure 4.1: Options appraised as reasonable alternatives through the SEA

Appraisal Findings

4.17 Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the appraisal has been presented through eight SEA themes which have been 'scoped-in' to the assessment, as follows:

- Air Quality.
- Biodiversity and Geodiversity.
- Climate Change (including Flood Risk).
- Community Wellbeing.
- Historic Environment.
- Land, Soil, and Water Resources.
- Landscape; and
- Transportation and Movement.

4.18 The appraisal considers the relative sustainability merits of the options. Findings are presented as a commentary on effects. To support the appraisal findings, the options have been ranked in terms of their sustainability performance against the relevant SEA theme (with '1' being the most well performing option), with conclusions reached on whether the options are likely to have significant effects on the baseline. It is anticipated that this will provide the reader with a likely indication of the relative performance of the options in relation to each theme considered. Likely significant effects are defined as positive, negative, or mixed (i.e., both positive and negative effects are anticipated). Where potential effects are uncertain, this is noted by a '?'.

4.19 The summary of appraisal findings is presented in **Table 4.1** below. An initial discussion on the similarities across the options for each SEA theme follows, along with a detailed overview of the key differences across the options to enable the sustainability trade-offs to be identified.

4.20 Sources of information to support the appraisal has included (amongst others): the SOA Report, Ordnance Survey maps, MAGIC Interactive Map,²² the Environment Agency's Flood Risk Maps for England,²³ Natural England's Agricultural Land Classification maps,²⁴ Google Earth,²⁵ reports and interactive mapping layers available on Guildford Borough Council's webpages,²⁶ the Surrey HER,²⁷ and baseline studies provided by the Neighbourhood Group.

²² MAGIC (2021): 'Interactive Map', [online] available to access via [this link](#)

²³ Environment Agency (2021): 'Flood Map for Planning', [online] available to access via [this link](#)

²⁴ Natural England (2021): 'Regional Agricultural Land Classification Maps and Likelihood of Best and Most Versatile Land', [online] available to access via [this link](#)

²⁵ Google (2021): 'Google Earth', [online] available to access via [this link](#)

²⁶ Guildford Borough Council (no date): 'Planning Information Map', [online] available to access via [this link](#)

²⁷ Surrey County Council (no date): 'Surrey Historic Environment Record', [online] available to access via [this link](#)

Summary of Appraisal Findings

Table 4.1: Rankings and likely significant effects of the options

SEA Theme		Option 1 (Site A)	Option 2 (Site B)	Option 3 (Site C)	Option 4 (Site D)	Option 5 (Site F)
Air Quality	Option Rank	4	3	1	=2	=2
	Significant effects?	No	No	No	No	No
Biodiversity and Geodiversity	Option Rank	3	2	1	5	4
	Significant effects?	Yes - mixed	Yes - mixed	No	Yes - negative	Yes - negative
Climate Change (including Flood Risk)	Option Rank	=1	=1	=1	2	3
	Significant effects?	No	No	No	No	Yes - negative
Community Wellbeing	Option Rank	1	2	3	4	4
	Significant effects?	Yes - positive	Yes - mixed	Yes - mixed	?	Yes - mixed
Historic Environment	Option Rank	4	2	3	=1	=1
	Significant effects?	Yes - negative	Yes - negative	Yes - negative	Yes - negative	Yes - negative
Land, Soil, and Water Resources	Option Rank	2	=1	=1	=3	=3
	Significant effects?	Yes - mixed	No	No	Yes - negative	Yes - negative
Landscape	Option Rank	=3	=3	2	=1	=1
	Significant effects?	Yes - negative	Yes - negative	Yes - negative	Yes - negative	Yes - negative
Transportation	Option Rank	1	=3	=3	2	4
	Significant effects?	Yes - mixed	?	?	Yes - mixed	Yes - negative

Similarities Across the Options

Air Quality

- 4.21 All five options would deliver growth within 4km of the Guildford Town Centre Air Quality Management Area (AQMA) and the A281, The Street, Shalford, Guildford, Surrey AQMA. It is also noted that there are a further two within 10km of Albury village (i.e., where all five options are located), including Waverley AQMA No. 2 and The Street, Compton, Surrey. Given that Guildford has a greater variety of services, facilities and amenities in comparison to Albury village, it is likely that growth through any option would result in an increase in journeys to this location, and by extension, the AQMAs. This is due to the need for residents to travel outside of the neighbourhood area to access a wider range of goods, services and employment opportunities.
- 4.22 In terms of sustainable transport infrastructure, the closest train station is located outside of the neighbourhood area in Chilworth, and there are a number of bus stops located centrally to Albury village along the A248. Growth through any of the options would be delivered within 400m of a bus stop, with all options located adjacent to or within the existing built-up area of the village. However, it is noted that public transport is limited, therefore reliance on the private vehicle is expected. Therefore, it is likely that development through all options will increase congestion and traffic in the area, and therefore potentially increasing local air pollutants. Effects are likely to be more pronounced along the A248.

Biodiversity and Geodiversity

- 4.23 There are no European designated sites for biodiversity within proximity to any of the five options. With respect to nationally designated sites, there is one Site of Special Scientific Interest (SSSI) in proximity to all of the options, Colyers Hanger SSSI, located to the northwest of the Albury village. However, growth through any of the five options will not overlap with any SSSI Impact Risk Zones (IRZs) for the types of development likely to come forward during the plan period (including residential, rural residential, and rural non-residential development). As such, none of the options are anticipated to indirectly impact the integrity of any nationally designated sites.
- 4.24 It is noted that all five options have the potential to support populations of protected species, including bats, birds and mammals (dormice and badgers, primarily). Although it is acknowledged that detailed ecological assessments have not been undertaken at this stage. Further, all five options sit within Countryside Stewardship Water Quality Priority Areas (medium priority). It is also noted that none of the options are anticipated to indirectly impact the integrity of the nationally important ancient and veteran tree site at Albury Park or the internationally important ancient and veteran yew site at Newlands Corner and Merrow Downs.

Climate Change (including Flood Risk)

- 4.25 In terms of climate change mitigation, all five options are anticipated to lead to a similar increase in absolute carbon and greenhouse gas emissions - related to an increase in activity (for example, an increase in domestic activities).
- 4.26 Additionally, all five options are adjacent to the existing built-up area, and as such are likely to provide opportunities to engage with sustainable and active

travel into the village centre. This will help to reduce emissions linked to transport. However, it is recognised that public transport networks within the neighbourhood area are limited. Additionally, all options are likely to require enhancements to pedestrian infrastructure, particularly where safe crossing points or footways are currently lacking, to support more sustainable and inclusive access to village services.

4.27 In terms of climate change adaptation, none of the sites would bring forward development in areas at risk of surface water flooding.

Community Wellbeing

4.28 All five options are located in proximity to the centre of Albury village, which contains local services including a post office, community facilities such as the village hall and village shop, and public transport links via bus stops along Albury Street. This locational advantage means that each site offers the potential to support community wellbeing by enabling residents to live within safe and reasonable walking distance of local amenities, reducing reliance on private vehicles and encouraging social inclusion. From a wellbeing perspective, this spatial relationship supports not only practical needs, such as convenience and mobility, but also helps foster a stronger sense of community cohesion.

4.29 Further, all options are considered likely to lead to positive effects with relation to community wellbeing by providing additional land for affordable housing. Effects are likely to be more pronounced on larger site options which could accommodate a greater mix of housing types and tenures.

Historic Environment

4.30 All five sites assessed are located within Albury's Conservation Area. This means that any development proposals would need to demonstrate a strong regard for the area's historic character and appearance, as required by national and local policy. On this basis, proposals should be accompanied by a heritage-led design approach that carefully considers the setting of nearby heritage assets, appropriate building scale, layout, and materials.

4.31 Further, each site has the potential for impact mitigation through sensitive design and landscaping. Although the sensitivity of individual sites differs, the SOA findings indicates that, in all cases, heritage impacts are not insurmountable and can be addressed through appropriate measures. These might include reduced development footprints, setbacks from key heritage features, use of native planting to screen views, and architectural styles that reflect local vernacular.

4.32 None of the options are within proximity to a designated battlefield or registered park and garden. Additionally, none of the options would deliver growth in areas with local historic environment records within the site boundaries.

Land, Soil and Water Resources

4.33 In terms of land, soil, and water resources, all five sites are located on greenfield land, meaning they have not been previously developed. This presents a shared constraint across all options, as development would result in the permanent loss of open, undeveloped land. Greenfield development is generally less favoured in comparison to brownfield land, due to its potential

impacts on landscape character, biodiversity, and soil health. As such, any development on these sites would need to demonstrate that it minimises environmental harm and integrates appropriate mitigation measures. However, it is also acknowledged that there are no brownfield sites available for development within or adjacent to the village.

- 4.34 Further, all of the sites are located within the Tillingbourne Water Body, part of the Wey Operational Catchment. The waterbody has a moderate ecological quality according to the latest condition assessments from 2022. All sites also sit within a Drinking Water Protected Area.

Landscape

- 4.35 All five sites are located entirely within the Surrey Hills National Landscape (NL), the designation formerly known as the Area of Outstanding Natural Beauty (AONB). This national designation is intended to conserve and enhance the natural beauty, scenic character, and tranquillity of the landscape. As such, any development within the NL must be sensitively designed to respect local landscape character, visual amenity, and the setting of key viewpoints, such as Newlands Corner. While small-scale affordable housing may be supported in principle where it contributes to community wellbeing and is appropriately designed, development proposals within the NL are expected to demonstrate how they avoid or minimise adverse landscape impacts.

- 4.36 In addition to the NL designation, all sites are also located within the Metropolitan Green Belt, where national and local policy impose strong controls on new development to prevent urban sprawl, safeguard the countryside, and preserve the openness of rural areas. Residential development in the Green Belt is generally considered inappropriate unless it falls under specific exceptions. In this context, all five sites are being assessed for their potential to deliver small-scale affordable housing schemes as rural exception sites, which can be considered acceptable in Green Belt locations when they meet identified local needs and are well-placed to existing settlements.

Transportation

- 4.37 In terms of sustainable transport, all sites are located within 400m of a bus stop, although the variety and frequency of services is limited. None of the sites benefit from immediate access to train services or designated cycle routes. Additionally, none of the sites are directly connected to Public Rights of Way (PRoW), which limits the potential to promote active travel through walking or cycling routes. The nearest train station is located outside the neighbourhood area in Chilworth, requiring travel by car or bus. This limited transport connectivity increases reliance on private vehicles across all options, with implications for local road congestion, parking demand, and air quality. As such, the delivery of any site is likely to require enhancements to pedestrian infrastructure, particularly where safe crossing points or footways are currently lacking, to support more sustainable and inclusive access to village services.

Key Differences Across the Options

Air Quality

- 4.38 Due to the size and layout of the sites, **Option 1 (Site A)** has the ability to accommodate a greater amount of growth in comparison to the other options,

and therefore could cause a larger increase in congestion, traffic, and pollutants in the area. However, it is acknowledged that it is unlikely that the whole site would be developed upon, therefore the overall impact on congestion, traffic, and pollutants is expected to be less significant than the theoretical maximum capacity might suggest. **Options 2 (Site B), 3 (Site C), 4 (Site D), and 5 (Site F)** are the most favourable from an air quality perspective due to their smaller developable areas, and thus lower likely traffic generation and pollutant emissions. However, it is recognised that in terms of property capacity, **Option 2 (Site B)** has a higher capacity than the other three sites (twelve dwellings as opposed to six), therefore is less favourable than the other sites mentioned.

- 4.39 It is acknowledged that **Options 4 (Site D) and 5 (Site F)** are located across the river, which already has some level of access issues and has potential to have a negative impact on congestion and traffic generation, therefore on local air quality.
- 4.40 Overall, it is considered that **Option 3 (Site C)** performs the most favourably given the smaller size and capacity of the area, as well as the fact that the site is accessible in comparison to **Options 4 (Site D) and 5 (Site F)**. **Options 4 (Site D) and 5 (Site F)** are then the next most favourable, as whilst they are small in capacity and size, they are located across the river which has potential to pose issues in terms of congestion and traffic generation. **Option 1 (Site A)** is considered to be least favourable as it is the largest in size and capacity.
- 4.41 Effects are not expected to be significant given the relatively small scale of growth likely to come forward at these locations during the plan period.

Biodiversity and Geodiversity

- 4.42 Residential growth will need to deliver a minimum 10% Biodiversity Net Gain (BNG) in line with national policy requirements. **Option 4 (Site D) and Option 5 (Site F)** are located entirely within National Habitat Network Enhancement Zone 1, indicating that they lie in areas with the highest strategic potential for habitat restoration and enhancement. These zones represent locations where interventions such as the creation, expansion, or improved management of habitats are most likely to deliver significant biodiversity benefits and contribute to a more connected and resilient ecological network. **Option 1 (Site A)** is also predominantly within Enhancement Zone 1, reflecting its potential to support habitat recovery, but its southern portion extends into Enhancement Zone 2, which generally has moderate potential for enhancement relative to Zone 1. **Options 2 (Site B) and 3 (Site C)** are located entirely within Enhancement Zone 2, suggesting lower strategic priority for habitat enhancement in terms of national connectivity goals. While this does not preclude development, it means that sites in Zone 1 (**Options 1 (Site A), 4 (Site D), and 5 (Site F)**) have the potential to have a greater ecological value and opportunities for BNG and may therefore necessitate a higher level of habitat-sensitive design, ecological mitigation, or compensation. **Options 4 (Site D) and 5 (Site F)** are also located adjacent to the River Tillingbourne, and therefore development of these sites may impact the biodiversity assets and value of the chalk stream.
- 4.43 It is also noted that **Option 4 (Site D)** includes an area that is directly adjacent on three sides to deciduous woodland BAP Priority Habitat. This designation indicates that the site supports habitats of high ecological value, which are a priority for conservation under the UK Biodiversity Action Plan. Development

within or adjacent to such areas could result in significant biodiversity impacts, requiring careful consideration of mitigation measures.

- 4.44 Considering the above, **Option 3 (Site C)** is considered the most favourable from a biodiversity perspective, as it is located entirely within Enhancement Zone 2 and has a smaller development capacity, which reduces the potential for ecological disturbance. **Option 2 (Site B)** is also located within Zone 2, indicating a lower strategic priority for habitat restoration; however, as a larger site option, the scale of development introduces a higher potential for ecological disturbance, reducing its relative favourability. That said, it is acknowledged that larger sites such as **Options 1 (Site A) and 2 (Site B)** also offer greater scope for on-site BNG, for example through the provision of connected green infrastructure, habitat corridors, or strategic planting, which could deliver measurable enhancements when integrated through sensitive design.
- 4.45 **Option 1 (Site A)** is less favourable as it lies predominantly within Enhancement Zone 1, which is of higher strategic importance for biodiversity enhancement and may require more intensive mitigation to align with national biodiversity net gain requirements. **Options 4 (Site D) and 5 (Site F)** are located entirely within Enhancement Zone 1, and directly adjacent to the River Tillingbourne, placing them in areas of highest strategic ecological value, and are therefore more constrained. In addition, **Option 4 (Site D)** includes an area directly adjacent to deciduous woodland BAP Priority Habitat on three sides, which significantly elevates its ecological sensitivity and potential for adverse impacts. As a result, **Option 4 (Site D)** is considered the most at risk from a biodiversity perspective, likely requiring substantial mitigation and design adaptation to avoid harm to priority habitats.

Climate Change (including Flood Risk)

- 4.46 In terms of climate change adaptation, none of the sites are risk of fluvial flood risk, except for **Option 5 (Site F)** which is located partially in the southwest of the site within Flood Zone 2 associated with the River Tillingbourne. As such, it is considered likely that development through this option could result in an exacerbation of flood risk. Whilst **Option 4 (Site D)** is also located on the River Tillingbourne on the southern boundary, it does not fall within Flood Zone 2 or 3 and therefore is not considered to be notably at risk. However, it is acknowledged that there will be an increased risk of flooding through **Options 4 (Site D) and 5 (Site F)** if they are developed, due to increased runoff into the river.
- 4.47 Overall, **Options 1 through 3 (Sites A, B and C)** are equally favourable in terms of climate resilience, with no parts of the sites located in areas at risk of fluvial or surface water flooding. **Option 4 (Site D)** is less favourable due to development potentially increasing flood risk, and **Option 5 (Site F)** is the least favourable as part of the site lies within Flood Zone 2, indicating some level of flood risk that could be exacerbated by development.

Community Wellbeing

- 4.48 **Option 1 (Site A)** is the only site with a developable area which could increase the viability of delivering a suitable mix of housing in terms of types, tenures, and affordability. A key benefit of the larger site in **Option 1 (Site A)** is that the design of new development areas could also potentially facilitate infrastructure improvements, such as formalised pedestrian links or on-site parking,

potentially enhancing local connectivity and reducing pressure on the village core. **Option 2 (Site B)** also has capacity for 12 dwellings, double that of the remaining three sites, and therefore also performs more favourably. Sites with potentially smaller developable areas within **Options 3, 4, and 5 (Sites C, D and F)** may limit opportunities to meet local housing needs. However, the ability to deliver a dispersed pattern of development across smaller sites might help to better reflect the scale and form of the existing village and maintain community identity and distinctiveness. It is also acknowledged that **Options 4 (Site D) and 5 (Site F)** are located over the river from the main village, and lack suitable access via a footway, which may limit opportunities for social interaction and access to shared facilities, reducing the sense of cohesion and belonging compared to options that are more integrated with the existing settlement. Therefore **Options 4 (Site D) and 5 (Site F)** are the least well performing options. On this basis, the developable area may reduce the viability of bringing forward affordable homes at this location.

Historic Environment

- 4.49 **Option 1 (Site A)** is in a particularly sensitive location, positioned opposite the Grade II listed Church of St Peter and St Paul and adjacent to the Duchess' Memorial. It also forms a prominent and open green space within the Conservation Area, making its visual impact a key concern, with the SOA report noting its "medium visual sensitivity." Development of the whole site area could have a more concentrated visual and heritage impact in light of these constraints, given **Option 1 (Site A)** comprises a site with the largest area in comparison to the other four options.
- 4.50 **Option 3 (Site C)** is located adjacent to the unlisted former Rectory and lies in proximity to the Grade II listed Church of St Peter and St Paul. It is also visible from the Newlands Corner historic viewpoint. However, despite this visibility and its medium visual sensitivity, small-scale development, if in keeping with the existing settlement form, may help to limit impacts to the historic setting of the village. **Option 2 (Site B)** is also visible from the Grade II listed Church. However, its more enclosed setting reduces its prominence compared to **Option 1 (Site A)**, lowering the likelihood of significant visual or heritage impacts.
- 4.51 **Options 4 (Site D) and 5 (Site F)** are located close to several Listed Buildings along Albury Street, but they benefit from natural separation by the River Tillingbourne and mature vegetation. This natural buffer provides greater opportunity to mitigate heritage impacts through sensitive layout and landscaping.
- 4.52 Overall, **Options 4 (Site D) and 5 (Site F)** are the most favourable options from a heritage perspective, benefiting from natural screening and distance from Listed Buildings. **Option 2 (Site B)** is also relatively favourable due to its enclosed setting and lower visual prominence. **Option 3 (Site C)** is moderately constrained, being adjacent to a locally significant heritage asset, within proximity to a Grade II Listed Building, and given its visibility from the Newlands Corner historic viewpoint. **Option 1 (Site A)** is considered to be the least favourable due to its prominent position directly opposite a Grade II Listed Church and within a visually sensitive open space in the Conservation Area. However, significant negative effects are concluded for all options at this stage, given that all of the sites have heritage sensitivities and are within the

boundaries of Albury Conservation Area (as noted in the 'similarities' section of the appraisal, presented above).

Land, Soil and Water Resources

- 4.53 According to the provisional Agricultural Land Classification (ALC) provided by Natural England, **Options 1, 2, and 3 (Sites A, B, and C)**, are identified as Grade 4, which denotes poor-quality agricultural land with limitations that significantly restrict the range of crops and land uses. In contrast, **Options 4 (Site D) and 5 (Site F)** are classified as Grade 3, but it is unclear whether this falls within subgrade 3a (best and most versatile land [BMV]) or 3b (moderate quality), as the provisional mapping does not differentiate between them. In this respect, growth through **Options 4 (Site D) and 5 (Site F)** have the potential to result in the permanent loss of BMV land for agricultural purposes, which cannot be mitigated.
- 4.54 Further, it is noted that **Option 4 (Site D)** and **Option 5 (Site F)** are located directly adjacent to the River Tillingbourne, and **Option 1 (Site A)** is set back approximately 40m from the river. Comparatively, **Option 2 (Site B)** and **Option 3 (Site C)** are not in proximity to the river. The close proximity of **Options 4 (Site D) and 5 (Site F)** to the River Tillingbourne increases the likelihood that development in these locations could have direct or indirect impacts on the water environment, including the riparian corridor, local biodiversity, and downstream water quality. National and local planning policy requires a minimum 10-metre buffer zone from the riverbank to be maintained free from development, which may reduce the developable area and constrain site layout. Furthermore, construction near the river may result in increased surface water runoff, disturbance of habitats, or recreational impacts unless appropriately mitigated. In contrast, **Options 1, 2, and 3 (Sites A, B, and C)**, by virtue of their greater distance from the river, present lower risk to water resources and are less likely to require site-specific watercourse mitigation measures.
- 4.55 Overall, for land, soil and water resources, **Options 1, 2, and 3 (Sites A, B, and C)** are the most favourable options due to being located on poorer quality agricultural land (Grade 4) and being set back from the River Tillingbourne. **Options 4 (Site D) and 5 (Site F)** are less favourable as they are potentially underlain by higher-quality Grade 3 agricultural land (potentially BMV), and are located directly adjacent to the river, increasing the risk of water environment impacts and development constraints.

Landscape

- 4.56 The SOA Report acknowledges that **Option 1 (Site A)**, **Option 3 (Site C)**, **Option 4 (Site D)**, and **Option 5 (Site F)** all have a low landscape sensitivity, as the sites are enclosed by the existing built-up area, and do not contain valued features that are included in the Landscape Character Assessment (LCA). However, it is recognised that all of the sites are within the Surrey Hills NL and Metropolitan Green Belt, which are significant constraints to development. Therefore, all options have the potential for significant adverse effects in the absence of high-quality design and placemaking principles.
- 4.57 With further reference to the sensitivities of the sites, **Option 2 (Site B)** has a medium landscape sensitivity and sits in a transitional zone between the settlement and the open farmland, as well as the woodland of the valley sides.

It is also acknowledged that if the whole site of **Option 1 (Site A)** was developed, it would significantly impact the size and character of the existing village by removing an open space which complements the visual setting of key features within the village and Conservation Area. **Option 3 (Site C)** is located in a transitional zone between the village and the Surrey Hills National Landscape, and is visible from a key viewpoint, Newlands Corner.

- 4.58 While landscape sensitivity plays an important role in assessing the potential for adverse impacts, it is also important to consider each site's visual containment, relationship to settlement form, and capacity for mitigation through design. **Options 4 (Site D) and 5 (Site F)** benefit from a combination of strong natural screening, visual enclosure, and proximity to existing development, offering clear opportunities for integrating small-scale housing without prominent visual intrusion. **Option 3 (Site C)**, although more exposed in the wider landscape and visible from Newlands Corner, is topographically aligned with the settlement and could be designed to preserve long-distance views through appropriate building height, layout, and landscaping. In contrast, **Option 1 (Site A)**, despite its low sensitivity rating, would result in a substantial change to the perceived scale and openness of Albury village if developed in full, which may be difficult to mitigate. However, it is acknowledged that this site is unlikely to be developed in full in terms of capacity, which would lower the impact of development on the landscape. **Option 2 (Site B)**, given its position within a transitional landscape and lack of strong enclosure, offers fewer opportunities to integrate development into the existing character without more significant impacts on landscape setting and quality (including the transitional zone between the village and the NL).
- 4.59 To conclude, considering both landscape sensitivity and the capacity of each site to visually integrate with the surrounding settlement and landscape context, **Options 4 (Site D) and 5 (Site F)** are considered the most favourable. These sites benefit from strong visual containment, natural screening, and an enclosed relationship to existing development, offering clear potential for sensitively designed housing with limited impact on local or long-range views. **Option 3 (Site C)**, although located outside the settlement boundary and visible from a significant viewpoint, is well aligned with the village topography and can likely be integrated with appropriate mitigation. **Option 1 (Site A)** is more prominent within the village core and would represent a substantial expansion relative to the existing settlement, potentially altering its perceived scale and openness. **Option 2 (Site B)** is also a less favourable option, sitting in a transitional, more open location with medium landscape sensitivity and fewer opportunities for visual containment, increasing the likelihood of adverse effects on landscape character.

Transportation

- 4.60 In terms of access to the sites, **Options 2 (Site B) and 3 (Site C)** currently have restricted vehicular and pedestrian access, via the narrow Church Lane and narrow Blackheath Lane respectively. Pedestrian access to either site would require access through land outside of the site boundaries. **Option 5 (Site F)** does not benefit from vehicle access.
- 4.61 **Option 1 (Site A)** has two options for access, either through Church Lane which is narrow and has no footway, or The Street which is a busy A-road with a footway and existing vehicular access that could need to be widened to serve

new development areas. Development at this location may contribute additional congestion to a busy A road that already experiences traffic issues. However, given the size of the site, new development areas may facilitate opportunities to enhance public rights of way and strengthen pedestrian connectivity between key parts of the village.

- 4.62 **Option 4 (Site D)** is accessed by an existing bridge over the River Tillingbourne, however there is no footway on the bridge, and if housing is delivered through this option, this could be a necessary addition. There is also a concern that development through this Option would exacerbate traffic in relation to the Village Hall.

Developing the Preferred Approach for the ANP

- 4.63 The preferred approach for the ANP has been informed by the SOA findings, SEA findings, and the wider evidence base (including feedback received from community consultation events). The Steering Group have also engaged in discussions with key stakeholders including Guildford Borough Council (GBC), Surrey Community Action, and local landowners. Specifically, the Steering Group's affordable housing site selection report states²⁸:

“Advice received from GBC planning was to select only the site/sites needed to deliver the affordable housing need as identified in the Housing Needs Survey 2024 for inclusion in the Neighbourhood Plan. It would not be possible to include sites without defined development proposals due to the sensitivity of Green Belt policy... [and sensitivities associated with the Surrey Hills National Landscape, Albury Conservation Area, and heritage assets].”

“The remaining sites could be brought forward as Rural Exception sites under Local Plan policy at a later date if future Housing Needs Surveys identified a need for more affordable homes and the information included in the evidence base would still be valid.”

- 4.64 In light of the above, the Regulation 14 version of the ANP allocates the following two sites as Rural Exception sites for affordable housing, meeting the requirements identified within the LHNS:

- **Site A:** Malcolm's Field (eight homes, including six affordable homes); and
- **Site C:** Birmingham Farm (nine homes, including six affordable homes).

- 4.65 The ANP establishes detailed design guidance and placemaking principles (see Policies ANP1 and ANP3) to help shape any new development areas which might come forward during the plan period. This includes a reduced site area for Malcolm's Field to protect the visual amenity and minimise the landscape impact where possible (see Policy Map Q within the ANP). Consideration is also given to the Local Plan policy on the requirements for Rural Exception sites (see Policy H2 and Policy H3). The ANP has a strong focus on design in this respect and has also been informed by various evidence studies including:

- A Design Guides and Codes document prepared for the neighbourhood area (see Appendix A within the ANP).

²⁸ ANP Steering Group (February 2026): 'Affordable Housing Site Selection Report' Appendix Q accompanying the Regulation 14 version of the ANP, containing recommendations for consideration by Albury Parish Council.

- The Surrey Hills NL Environmental Design Guidance (Appendix C); and
- A local heritage report (Appendix E) which includes a village character assessment.

4.66 Additionally, the ANP encourages opportunities for rural enterprise (e.g., proposals supporting local employment provision or potential renewable energy generation) and opportunities to enhance the tourism offer across the area. The ANP recognises the challenges of delivering growth in light of the significant constraints to development in the neighbourhood area, including the Surrey Hills NL, Metropolitan Green Belt, and heritage assets, but does not seek to preclude high-quality development coming forward during the plan period on available sites (subject to local and national policies and guidance).

5. Appraising the Regulation 14 Version of the ANP

Introduction

5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the Regulation 14 version of the ANP. This chapter presents:

- An appraisal of the current version (i.e., the Regulation 14 version) of the ANP under the eight SEA theme headings; and
- The overall conclusions at this current stage.

Albury Neighbourhood Plan Policies

5.2 **Table 5.1** sets out the Albury Neighbourhood Plan policies.

Table 5.1 Albury NP policies

Policy reference	Policy name
ANP1	Albury Parish Design & Guidance Codes
ANP2	Conservation Areas
ANP3	Affordable Homes To Meet Local Needs
ANP4	Infill Residential Development
ANP5	Heritage
ANP6	Local Services and Community Facilities
ANP7	Commercial and Land-Based Activities And Uses
ANP8	Rural Enterprise
ANP9	Tourism
ANP10	Tourist Accommodation
ANP11	Local Green Spaces
ANP12	Dark Skies
ANP13	Biodiversity
ANP14	Important Views
ANP15	Net Zero, Climate Change And Building Design
ANP16	Renewable Energy
ANP17	Flood Risk
ANP18	Sustainable Travel & Parking
ANP19	Allotments

Methodology

- 5.3 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see Table 3.2) as a methodological framework.
- 5.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.
- 5.5 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.

Assessment of the ANP

Summary of the Policies and Proposals in the ANP

- 5.6 The ANP sets out 19 policies related to the development and use of land within the designated neighbourhood area. Many policy matters have been left to the adopted Guildford Local Plan, recognising that the Neighbourhood Plan should support and, where appropriate, strengthen higher-level planning policies but not undermine or conflict with them. Focus is therefore placed on, for example, setting more detailed design standards (through area wide Design Guidance and Codes), and identifying potential locations for development to meet locality identified needs.
- 5.7 A key objective of the ANP is for the community of Albury to continue to grow sustainably, whilst protecting the openness and permanence of the Metropolitan Green Belt (within which Albury sits). Albury Parish is also set entirely in the Surrey Hills National Landscape, and Area of Great Landscape Value. While these designations are provided protection through higher level planning policy, the ANP also recognises the designations as constraints in terms of rural economic growth and local housing need. Nonetheless, opportunities to encourage rural enterprise is supported, to enhance the tourism offer and local economy.
- 5.8 The Guildford Local Plan identifies Albury as a 'small village' in a rural area and is not provided with a housing requirement. However, the Albury LHNS identifies the need for affordable properties and smaller properties, which could lead to an unbalanced community if not addressed. While new housing needs are being addressed through the Local Plan, affordable housing remains in short supply throughout the borough and in Albury parish.

- 5.9 Policy ANP3 supports the delivery of affordable homes on two sites identified in Policy Map Q (as discussed in **Chapter 4** of this Environmental Report). Proposals would be supported only where they deliver the specific local housing need or enhance the rural economy, and subject to the detailed design guidance and criteria within the wider ANP policy framework.
- 5.10 In addition to addressing local housing needs, the ANP seeks to capitalise upon the role of the village as a tourist destination, and the opportunity presented to both protect and enhance the local heritage offer. Policies look to strengthen rural businesses and growth of the local economy, while also setting parameters for cyclists, commuters and traffic to reduce impacts on the landscape, habitats and species; and improve road safety.
- 5.11 The delivery of community infrastructure is also supported through the ANP where local needs are addressed, and infrastructure meets climate objectives.
- 5.12 A key supporting document to the ANP is the area wide Design Guidance and Codes, prepared by AECOM (2023). The design codes strengthen the Plan's design policies by providing clear and specific design requirements, ensuring development reflects Albury parish's distinctive local character. This contributes positively towards delivering the aims and objectives of the ANP.

Air Quality

- 5.13 The neighbourhood area is approximately 3.6km away from the A281, The Street, Shalford, Guildford, Surrey AQMA and 3.7km west of the Guildford Town Centre AQMA, both designated due to high NO₂ emissions. The A281 is a key part of the strategic road network surrounding Albury and leads to Guildford, the nearest town to the neighbourhood area (which also has the Guildford Town Centre AQMA). As Guildford is the nearest town to the neighbourhood area, it is likely that many residents travel into this town to access wider services and facilities and employment opportunities.
- 5.14 It is recognised that the ANP is supportive of growth at locations within and adjacent to Albury village where they can deliver specific housing needs for the area. As set out in Chapter 4, the proposed site allocations are in reasonable proximity to AQMAs and would likely result in an increase in journeys to Guildford – and by extension, the AQMAs. This is due to the need for residents to travel outside of the neighbourhood area to access a wider range of goods, services and employment opportunities. While development could exacerbate local air quality issues in AQMAs in proximity to the neighbourhood area, it is recognised that the level of growth proposed is small, and development will need to align with the Albury Design Codes and Guidance (which seeks to improve air quality through sustainable design principles).
- 5.15 While it is noted that public transport in the neighbourhood area is limited, the policy framework supports opportunities to improve the active and sustainable travel offer where possible (see Policy ANP18). The ANP establishes key issues and priorities in this respect, with focus placed on traffic volumes, “commuter time” bus services, speeding, and parking. The requirements set through the Albury Design Codes and Guidance also contribute to positive effects in this respect.
- 5.16 Taking the above into consideration, broadly **neutral effects** are predicted in relation to air quality. While new development at supported sites is likely to

lead to a net increase in trips to /from Guildford via private car, the level of growth likely to come forward during the plan period is unlikely to lead to significant changes in air quality associated with the AQMAs close by, nor air quality locally in Albury parish. Consideration is also given to the policy framework supported by the area wide Design Code and Guidance, which seek to reduce and mitigate adverse effects where possible.

Biodiversity and Geodiversity

- 5.17 The parish is rich in biodiversity, extending from nationally designated Sites of Special Scientific Interest (SSSI), areas of Ancient Woodland, and Ancient and Veteran Trees. It also contains local designations such as Sites of Nature Conservation Importance (SNCI), Regionally Important Geological/ Geomorphological Sites (RIGS), and a large Biodiversity Opportunity Area (BOA). In this respect, the neighbourhood area is likely to support populations of protected species, with bats, birds, and mammals (i.e., dormice and badgers) observed by the community. These are identified in the Green Infrastructure Report, appended to the ANP, and a focus of Policy ANP13.
- 5.18 Policy ANP13 and ANP11 seek to protect and enhance green infrastructure within the neighbourhood area, which will be important to maintaining functional ecological corridors that support species linked to the SPA and SSSIs within/ nearby the parish. Policy ANP13 seeks to address the habitat fragmentation seen across the area, reflected in the designation of a Green and Blue Infrastructure Network, which seeks to promote habitat creation and linkages. Positive effects are anticipated, reflective of the opportunities being capitalised upon to enhance ecological connectivity through targeted habitat restoration and enhancement.
- 5.19 Policy ANP13 also sets an ambitious requirement for development to deliver 20% BNG which is double the UK's statutory minimum of 10%. Under national legislation, a minimum 10 % BNG is required for most developments in England. However, Guildford Borough Council's local planning policy goes further, requiring 20 % BNG within the borough, unless specific exemptions apply. If delivered, larger gains can allow for improved habitat quality and a more connected higher-quality local biodiversity resource, supporting broader nature recovery goals (such as the delivery of the Environment Improvement Plan's Nature Recovery Network²⁹). This has the potential to deliver cumulative positive effects alongside any emerging local policy provisions in the update to Guildford Local Plan.
- 5.20 Policy ANP3 sets the broad location for new homes within the parish (i.e. those sites identified in Policy Map Q), where proposals can demonstrate they will deliver specific housing needs. As set out in Chapter 4, neither of the proposed site allocations are constrained by designated biodiversity but have potential to support habitat enhancement and/ or populations of protected species.
- 5.21 Furthermore, development will only be supported where criteria set out within Policy ANP3 is met, which includes the protection and enhancement of the natural environment; with greater detail (including tailored development requirements) provided through the Design Codes and Guidance. In line with Policy ANP1 development should respond positively to the natural environment

²⁹ [The Nature Recovery Network - GOV.UK](https://www.gov.uk/government/news/nature-recovery-network)

as identified in the Albury Design Guidance and Codes. Design Code 11 (see Appendix A within the ANP) specifically focuses on biodiversity interventions in public spaces, and how green and blue assets can contribute to biodiversity connectivity. Retaining and enhancing existing natural features and embedding biodiversity into the built environment is anticipated to lead to long term positive effects against this SEA theme.

- 5.22 Policy ANP7 and Policy ANP8 focus on the management of the rural economy and determining proposals for land use. It is recognised that future changes in land use, even at a small scale, could contribute to incremental habitat pressures such as air pollution, increased recreational access, and changes in local ecological connectivity. Proposals are therefore required through Policy ANP7 to demonstrate that the proposal would avoid an adverse impact on wildlife and habitats, in line with Policy ANP13 - Biodiversity. Proposals must also align with the Design Codes and Guidance.
- 5.23 Taking the above into consideration, **minor positive effects** are predicted against the biodiversity SEA theme. The policy framework seeks to protect and enhance existing features that contribute to biodiversity in the area whilst also outlining measures which seek to improve the connectivity and functionality of ecological networks and deliver net gains for nature.

Climate Change (including Flood Risk)

- 5.24 It is assumed that growth through the ANP will lead to an increase in overall GHG emissions within the neighbourhood area due to an increase in the local population during the plan period. This is partially due to an uptake in private vehicle usage as the village has relatively limited services and facilities. Whilst bus services run through the parish to Guildford, Cranleigh and Dorking, these do not serve the entirety of the parish, and there is no sustainably accessible train station. However, given the level of growth expected during the plan period is relatively low (and focused on meeting specific local needs), and considering the global nature of climate change, this is not considered likely to be significant.
- 5.25 In relation to the above, Policy ANP18 (Sustainable Travel & Parking) encourages safe, accessible and convenient means of walking and cycling in the parish, promoting the delivery of sustainable transport measures where possible (see also Albury Design Codes and Guidance). This has the potential to improve connectivity across the parish, promoting the use of active travel for local trips, which will in turn reduce transport-induced GHG emissions. Policy ANP18 also sets a requirement for electric vehicle charging infrastructure, in accordance with higher level policy.
- 5.26 It is recognised that both site allocations benefit from a village location, and as such are likely to provide opportunities to engage with sustainable and active travel into Albury and further afield. Nevertheless, it is recognised that the existing PRow and cycle network is currently limited, and that traffic volume on the A248, The Street, also referred to as the 'Guildford southern by-pass' is concerningly increasing. As such, additional growth around the village could exacerbate existing issues.
- 5.27 Guildford Borough Council has declared a climate emergency and is committed to achieving net zero by 2050. While supporting new development on suitable

sites, the ANP also sets out its support for reaching Guildford's net zero target. Policies ANP15 (Net Zero, Climate Change and Building Design) and ANP16 (Renewable Energy) promote carbon reduction initiatives, sustainable design standards, and nature-based solutions for climate adaptation. Cumulative and in-combination positive effects are anticipated in this respect.

- 5.28 As mentioned above, the Albury Design Codes and Guidance accompanying the ANP (Policy ANP1: Design and Design Codes) further embeds sustainable design principles, ensuring best practices are adopted - such as energy-efficient design, sustainable construction materials, and renewable energy integration. Embedding sustainability into local design guidelines will lead to positive effects overall, addressing inevitable increasing emissions within the neighbourhood area.
- 5.29 In terms of flood risk, it is recognised that any increase in the built footprint of the neighbourhood area has the potential to exacerbate flood risk issues (i.e., from surface water run-off and potential proximity to flood risk areas). In this respect, the policy framework (ANP1) sets out that proposals must align with the Design Codes and Guidance. This includes code DG.12 Eco-design and Zero Carbon Development, which focuses on flood resilience and resistance; and provides further detail to national policy requirements (i.e. the delivery of SuDS). It is also important to note that both site allocations are not within proximity to the River Tillingbourne and therefore are not likely to exacerbate fluvial flood risk issues in the village.
- 5.30 Taking the above into consideration, the ANP is considered likely to lead to **broadly neutral effects** with regard to climate change and flood risk. Whilst growth supported through the ANP is likely to lead to an increase in overall GHG emissions, given the low level of growth which is likely to come forward during the plan period, and considering the global nature of climate change, this is not considered likely to be significant. In addition, the policy framework seeks to improve active travel infrastructure in the neighbourhood area and also seeks to improve climate and flood resilience through design.

Community Wellbeing

- 5.31 The Guildford Local Plan identifies Albury as a 'small village' in a rural area and has not been provided with a housing requirement. However, the Albury LHNS identifies the need for affordable rental/shared ownership properties and smaller properties, which could lead to an unbalanced community if not addressed. While new housing needs are being addressed through the Local Plan, affordable housing remains in short supply.
- 5.32 In light of the above, the ANP is supportive of development proposals coming forward on the site allocations identified in Policy Map Q which would meet the specific local needs identified within the LHNS. The ANP establishes detailed design guidance and placemaking principles (see Policies ANP1 and ANP3) to help shape any new development areas which might come forward during the plan period. The ANP has a strong focus on design in this respect (see Policies ANP1 – ANP5) and has been informed by various evidence studies including:
- A Design Guides and Codes document prepared for the neighbourhood area (see Appendix A within the ANP).
 - The Surrey Hills NL Environmental Design Guidance (Appendix C); and

- A local heritage report (Appendix E) which includes a village character assessment.

- 5.33 Additionally, the ANP encourages opportunities for rural enterprise (e.g., proposals supporting local employment provision or potential renewable energy generation) and opportunities to enhance the tourism offer across the area (see Policies ANP7 – ANP10). For example, the policy framework looks to strengthen rural businesses and growth of the local economy, while also setting parameters for cyclists, commuters and traffic to reduce impacts on the landscape, habitats and species; and improve road safety. The ANP recognises the challenges of delivering growth in light of the significant constraints to development in the neighbourhood area, including the Surrey Hills NL, Metropolitan Green Belt, and heritage assets, but does not seek to preclude high-quality development coming forward during the plan period on available sites (subject to local and national policies and guidance).
- 5.34 As mentioned, the neighbourhood area is largely a rural economy, offering essential community facilities, including a post office, village shop, public houses, churches, a village hall, and various recreational amenities. However, the absence of primary educational institutions and nurseries within the area means families must rely on facilities in neighbouring communities. In this context, the delivery of community infrastructure is also supported through the ANP (see Policy ANP6) where local needs are addressed, and infrastructure meets climate objectives.
- 5.35 The wooded hills, chalk grasslands, and extensive footpath network (including the Greensand Way) throughout the neighbourhood area provide valuable habitats and opportunities for outdoor recreation. These features support biodiversity, promote wellbeing, and enhance the parish's rural character. However, increased recreational pressure or poorly designed development could threaten these assets, requiring careful management and safeguarding. On this basis, the policy framework within the ANP also seeks to protect and enhance these assets whilst also improving the availability of additional recreational spaces for residents and visitors. Key policies in this respect include Policy ANP19 (Allotments), Policy ANP13 (Biodiversity), and Policy ANP11 (Local Green Spaces). Along with Policy ANP6 (Local Services and Community Facilities), these provisions will help to address some of the key challenges highlighted by local residents with respect to distance from essential services and opportunities to enjoy accessible and interconnected open spaces.
- 5.36 Overall, the ANP is likely to deliver **significant positive effects** with respect to the community wellbeing SEA theme. This is linked to the strong focus on delivering high-quality, sustainable, and inclusive design within proposals for housing which would meet specific local needs. The wider policy framework introduces opportunities to support the rural economy, improve the offer of local services and facilities, and enhance the quality of the public realm. This includes through safeguarding open spaces and biodiversity, encouraging sustainable tourism, and respecting the area's rich heritage, character and distinctiveness. This will help to facilitate active and healthy lifestyles for all residents and tourists to the neighbourhood area, supporting quality of life and enjoyment of Albury as a place to visit, live and work.

Historic Environment

- 5.37 The neighbourhood area contains several designated heritage assets that significantly contribute to the historic character of the village, particularly within and near the Parish's two conservation areas. These assets are notably associated with rural, industrial, religious and aristocratic history and still draw visitors to the parish. It is noted that no Conservation Area Appraisals (CAA) have been prepared for either of the conservation areas.
- 5.38 Given the rich heritage of the area, and absence of a CAA, the ANP seeks to establish the different built style and characteristics of five distinct areas of the parish. The Albury Parish Design Guidance and Code (2023) (see Appendix A within the ANP) has therefore been prepared as a reference guide for future development to ensure the characteristics of these areas are retained. The Design Guidance and Code adds further detail to the Guildford Residential Design Guide Supplementary Planning Document (SPD) (2004) and Residential Extensions and Alterations SPD (2018) and identifies the essential design considerations within the five areas. Policy ANP1 (Design and Design Codes) and ANP2 (Albury Village Conservation Areas) seek to ensure proposals demonstrate that they have full regard to the Albury Design Guidance and Code, particularly the special architectural and historic significance of the designated Albury Conservation Area and its setting. This reflects key statements within the National Design Guide (2021), which include (for example) that well designed places should "*respond to existing local character and identity, and preserve important historic features and assets*".
- 5.39 Policy ANP3 is supportive of proposals on the sites identified in Policy Map Q, where proposals can demonstrate they will deliver specific housing needs. As set out in Chapter 4, both sites have heritage sensitivities which would require mitigation. Development will only be supported where criteria set out within Policy ANP3 is met, which includes extensive reference to the protection and enhancement of the historic environment; with greater detail (including tailored development requirements) provided through the Design Codes and Guidance (see Appendix A within the ANP).
- 5.40 Policy ANP4 specifically explores infill residential development within the Green Belt and sets parameters for where this might be appropriate within Albury. New development of this type will be required to respond to the local historic context in accordance with the Design Codes and Guidance (see Appendix A within the ANP), ensuring residual adverse effects on the historic environment are avoided. This approach meets the requirements of the Guildford Local Plan Policy P2 which supports limited infilling and Policy D1 which acknowledge the importance of village character and local distinctiveness. Furthermore, it aligns with the National Design Guide (2019) which endorses infill development where it reflects street frontages and reinforces the existing character of the area.
- 5.41 It is also acknowledged that new development areas provide an opportunity to enhance the understanding of, and access to, heritage assets of both local and national significance. This is reflected through Policy ANP5 (Heritage) with the potential for long term positive effects. Proposals should safeguard the significance of listed buildings, scheduled ancient monuments and locally listed buildings; and consider impact on historic setting.

5.42 Overall, the policy framework within the ANP has a strong focus on protecting and enhancing the rich heritage resource in the neighbourhood area, notably through the stipulations within the Design Guidance and Codes (see Appendix A within the ANP). Growth during the plan period is therefore likely to safeguard local distinctiveness and apply placemaking principles which respect the special historic interest, character and appearance of heritage assets and areas (and their settings). On balance, **broadly neutral effects** are concluded for the historic environment SEA theme.

Land, Soil and Water Resources

5.43 The proposed site allocations (see Policy ANP3) are all located on greenfield land, and therefore their development would result in the permanent loss of open, undeveloped land. In the absence of a detailed agricultural land classification assessment, it is not possible to determine whether any of the sites would result in the permanent loss of best and most versatile land. However, it is recognised that the proposed site allocations (see Policy ANP3) are likely to be underlain by Grade 4 land (which is not considered best and most versatile for agricultural purposes). It is also acknowledged that there are no available brownfield site options within or in proximity to Albury village.

5.44 Further, all of the sites are located within the Tillingbourne Water Body, part of the Wey Operational Catchment. The waterbody has a moderate ecological quality according to the latest condition assessments from 2022. All sites also sit within a Drinking Water Protected Area. Given water resource management is strongly tied to national policy and legislation, any developer of supported sites would be required to consider these factors at the design stage. Proposals would also be required to be in line with the Albury Design Guidance & Codes (Policy ANP1). Both site allocations are not likely to impact the River Tillingbourne due to their distance from the watercourse.

5.45 The wider policy framework also has a land, soil, and water focus. Key policies in this regard include Policy ANP13 (Biodiversity) and Policy ANP11 (Local Green Spaces) which aim to protect and expand green and blue infrastructure networks. This will help to safeguard the natural environment in the neighbourhood area, and contribute to protecting land, soil and water resources by safeguarding underlying soils, and regulating resource quality.

5.46 Overall, **broadly neutral effects (0) are anticipated for the Land, Soil, and Water Resources SEA theme**. Development at the supported sites will result in the loss of a small level of greenfield land. However, the sites are not likely to be underlain by best and most versatile land and are set-back from the River Tillingbourne. Additionally, the wider policy framework seeks to protect key features of landscape and biodiversity interest, which will indirectly support land, soil and water resources by safeguarding green infrastructure networks and facilitating improvements to the public realm.

Landscape

5.47 The entirety of the neighbourhood area is within the Surrey Hills NL, the Metropolitan Green Belt, and an Area of Great Landscape Value (AGLV). The Green Belt and NL place strong controls on development; while the Green Belt focuses on limiting urban sprawl, the NL designation seeks to conserve scenic and ecological value. As a result, there is a need to balance Albury's

development needs with landscape protection, ensuring that any future growth is sensitive to the area's character and visual qualities.

- 5.48 The parish is also identified as having a varied and distinctive local character, falling within two National Character Areas (NCAs); the North Downs and the Wealden Greensand. These NCAs bring contrasting landforms, ecological features, and historic patterns of land use. Notably the parish is dissected by the River Tillingbourne with hills on either side contributing towards the varied landscape. Recognising and responding to this variation in any future planning or design work will be important to maintain the area's sense of place and environmental integrity.
- 5.49 Policy ANP3 is supportive in principle of development at sites identified in Policy Map Q, where proposals can demonstrate they will deliver specific housing needs. As set out in Chapter 4, all sites assessed are located within and around the village, and within the National Landscape, with varying levels of landscape sensitivity. While small-scale affordable housing may be supported in principle where it contributes to community wellbeing and is appropriately designed, development proposals within the NL are expected to demonstrate how they avoid or minimise adverse landscape impacts. This is reflected within the reduced site area for Malcolm's Field to protect the visual amenity and minimise the landscape impact where possible (see Policy Map Q within the ANP). Furthermore, in accordance with Policy ANP3, higher level policy provision, and the Design Codes and Guidance; any development within the NL will be required to be sensitively designed to respect local landscape character, visual amenity, and the setting of key viewpoints.
- 5.50 The Surrey Hills Management Plan forms part of the evidence base for the ANP, notably in relation to determining proposals for land use (Policy ANP7: Commercial & Land-Based Activities & Uses). Policy ANP7 sets requirements for managing proposals for commercial and land-based activities, recognising that the parish incorporates several commercial businesses derived from land use development. Key considerations include national and local Green Belt policy, the Surrey Hills NL, the character and appearance of the surrounding area, and the wider ANP policy framework.
- 5.51 Consideration is also given to rural businesses in the context of the landscape, and therefore Policy ANP8 (Rural Enterprise) seeks to encourage opportunities for organic growth in local employment and other economic opportunities. Existing employment sites are identified through Policy ANP8 (Rural Enterprise) as focus for growth in this respect, provided a range of criteria is met. This includes consideration of Green Belt policy and safeguarding the amenity of surrounding neighbours.
- 5.52 The ANP supports Albury as a dark skies parish (Policy ANP 12: Dark Skies) and seeks to avoid light pollution unless there is a justifiable safety reason to do so. Preserving the visibility of the night sky within a rural, sensitive area such as Albury can deliver long term positive effects for the landscape. Similarly, Policy ANP14 (Important Views) is merited for protecting a series of important views identified from public vantage points within the parish.
- 5.53 Positive effects are broadly considered in relation to the wider policy framework, where policies support local identity and sense of place, strengthening the rural nature of the area. Protection and enhancement of

green corridors, trees and natural features can also create more connected, nature-rich landscapes, alongside investment in active travel routes and community facilities.

- 5.54 Given the constrained nature of the site allocations in the neighbourhood area, a precautionary approach is taken, and **minor negative effects** are concluded overall for the landscape SEA theme. A degree of uncertainty nonetheless exists, given the strength of the policy provisions (supported by higher level policy) and detailed Design Codes and Guidelines which accompany the ANP. Development that comes forward in Albury will be required to avoid impact on the Green Belt and National Landscape where possible, and deliver high quality, contextual design.

Transportation

- 5.55 The ANP performs positively in terms of supporting growth at sites which are relatively sustainably located in and around the village centre. However, given the limited sustainable transport connectivity throughout the parish, any new development will likely increase reliance on private vehicles, with implications for local road congestion, parking demand and road safety.
- 5.56 Public footpaths and cycle paths within the neighbourhood area are notably limited. Access to the train station would be via the private vehicle outside of the parish, and bus services, while running through the parish to Guildford, Cranleigh and Dorking, do not serve the south of the parish. Policy ANP18 (Sustainable Travel and Parking) supports development where it seeks to address these limitations in sustainable transport/ travel; specifically setting a requirement for proposals to make a financial contribution to a package of local sustainable transport measures.
- 5.57 The road network consists of two A roads which have safety concerns for local residents. Areas of limited/ no pavement are particularly hazardous, with road safety and congestion being key issues for the area. Many roads in the parish are often passable by only one vehicle, reflective of the rural nature of the area. Policy ANP18 seeks to ensure that proposals provide sufficient on-site parking and minimise the impact on the street scene. Safe, secure and accessible sheltered cycle parking is also a requirement for all proposals. Further conditions in this regard are set through the Design Guidelines and Codes (Policy ANP1).
- 5.58 More broadly, Policy ANP6 (Local Services and Community Facilities) requires that any enhancements to existing community facilities should provide improved parking capacity to meet any increased demand on the facility. A similar requirement is set for proposals under Policy ANP7 (Commercial & Land Based Activities & Uses), ensuring that an adequate level of parking is contained on-site. The preparation of a Transport Assessment is also required for commercial and land-based activities to ensure highway safety and congestion is appropriately managed. Policies perform positively in terms of addressing these key issues and objectives for the Neighbourhood Plan.
- 5.59 Overall, the policy framework supports active travel and encourages a shift toward more sustainable modes of transport where feasible. It also includes measures to address local priorities, for example in relation to parking provision, road safety, and improving connectivity and walkability between key

locations. In conclusion, the ANP is considered likely to lead to broadly **neutral effects** with regard to the transportation SEA theme.

Conclusions

5.60 The likely environmental effects associated with the ANP are identified by the following scoring matrix:

- Significant positive effects (++)
- Minor positive effects (+)
- Neutral or no effects (0)
- Minor negative effects (-)
- Significant negative effects (--)

5.61 **Broadly neutral effects (0) are anticipated in relation to the Air Quality SEA theme.** While new development at supported sites is likely to lead to a net increase in trips to/from Guildford via private car, the level of growth likely to come forward during the plan period is unlikely to lead to significant changes in air quality associated with the AQMAs close by, nor air quality locally in Albury. Consideration is also given to the policy framework supported by the area wide Design Code and Guidance, which seek to reduce and mitigate adverse effects where possible.

5.62 **Minor positive effects (+) are concluded for the Biodiversity and Geodiversity SEA theme.** The policy framework seeks to protect and enhance existing features that contribute to biodiversity in the area whilst also outlining measures which seek to improve the connectivity and functionality of ecological networks and deliver net gains for nature.

5.63 **The ANP is considered likely to have broadly neutral effects (0) with regard to the Climate Change (including Flood Risk) SEA theme.** Whilst growth supported through the ANP is likely to lead to an increase in overall GHG emissions, given the low level of growth which is likely to come forward during the plan period, and considering the global nature of climate change, this is not considered likely to be significant. In addition, the policy framework seeks to improve active travel infrastructure in the neighbourhood area and also seeks to improve climate and flood resilience through design.

5.64 **The ANP is likely to deliver significant positive effects (++) with respect to the Community Wellbeing SEA theme.** This is linked to the strong focus on delivering high-quality, sustainable, and inclusive design within proposals for housing which would meet specific local needs. The wider policy framework introduces opportunities to support the rural economy, improve the offer of local services and facilities, and enhance the quality of the public realm. This includes through safeguarding open spaces and biodiversity, encouraging sustainable tourism, and respecting the area's rich heritage, character and distinctiveness. This will help to facilitate active and healthy lifestyles for all residents and tourists to the neighbourhood area, supporting quality of life and enjoyment of Albury as a place to visit, live and work.

5.65 **On balance, broadly neutral effects (0) are concluded for the Historic Environment SEA theme.** The policy framework within the ANP has a strong focus on protecting and enhancing the rich heritage resource in the

neighbourhood area, notably through the stipulations within the Design Guidance and Codes. Growth during the plan period is therefore likely to safeguard local distinctiveness and apply placemaking principles which respect the special historic interest, character and appearance of heritage assets and areas (and their settings).

- 5.66 **Broadly neutral effects (0) are anticipated for the Land, Soil, and Water Resources SEA theme.** Development at the supported sites will result in the loss of a small level of greenfield land. However, the sites are not likely to be underlain by best and most versatile land and are set-back from the River Tillingbourne. Additionally, it is recognised that the wider policy framework seeks to protect key features of landscape and biodiversity interest, which will indirectly support land, soil and water resources by safeguarding green infrastructure networks and facilitating improvements to the public realm.
- 5.67 Given the constrained nature of the site allocations in the neighbourhood area (i.e., their location within the Surrey Hills NL and the Metropolitan Green Belt), a precautionary approach is taken, and **minor negative effects (-) are concluded for the Landscape SEA theme.** A degree of uncertainty nonetheless exists, given the strength of the policy provisions (supported by higher level policy) and detailed Design Codes and Guidelines which accompany the ANP.
- 5.68 **Broadly neutral effects (0) are concluded for the Transportation SEA theme.** Overall, the policy framework supports active travel and encourages a shift toward more sustainable modes of transport where feasible. The ANP also includes measures to address local priorities, for example in relation to parking provision, road safety, and improving connectivity and walkability between key locations.

6. What Are the Next Steps?

Plan Finalisation

- 6.1 Following Regulation 14 consultation, responses will be considered in finalising the ANP and SEA for submission. Following submission, the ANP and supporting evidence will be published for further consultation and then subject to Independent Examination. At Independent Examination, the ANP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.
- 6.2 If the examination leads to a favourable outcome, the ANP will then be subject to a referendum, organised by Guildford Borough Council. If more than 50% of those who vote agree with the ANP, then it will be 'made'. Once 'made', the ANP will become part of the Development Plan for Guildford, covering the defined neighbourhood area.

Monitoring

- 6.3 The SEA regulations require '*measures envisaged concerning monitoring*' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.
- 6.4 It is anticipated that monitoring of effects of the ANP will be undertaken by Guildford Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the ANP that would warrant more stringent monitoring over and above that already undertaken by Guildford Borough Council.

